



Norwich to Tilbury Development Consent Order

Examination Deadline 5 Submission

Dear Sir/Madam,


Please find enclosed the document entitled Landscape and Visual Technical Note, prepared by Planscape Consultants Limited on behalf of Villages against Pylons, an Interested Party in the Norwich to Tilbury Development Consent Order Examination.

This Technical Note is submitted in respect of Examination Deadline 5 and has been prepared on behalf of Villages against Pylons following Question LV2.18 of the Examining Authority's Second Round of Written Questions Issued on 22 May 2026 (EXQ2), which acknowledged that Villages against Pylons intended to submit a landscape study during the Examination process. This document constitutes that submission.

The Technical Note has been prepared by Mr Ryan Mills BSc (Hons) MSc CMLI, Director and Landscape Architect at Planscape Consultants Limited.

We request that this submission is accepted into the Examination Library and taken into account by the Examining Authority in its consideration of the application.

Yours faithfully,


Director and Landscape Architect
Planscape Consultants Limited

Planscape



Norwich to Tilbury
Development Consent Order

Landscape and Visual Technical Note

Examination Deadline 5 Submission

On behalf of Villages against Pylons

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Director and Landscape Architect,
Planscape Consultants Limited
June 2026

Planscape



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1 Introduction

Background and Particulars

This technical note has been prepared on behalf of 'Villages against Pylons', a resident's group within the Colne Valley area to the north-east of Colchester, between West Bergholt and Fordham. It relates to the proposed Norwich to Tilbury electricity transmission reinforcement project currently subject to Examination under the Development Consent Order (DCO) process.

It has been prepared by Ryan Mills, Director and Chartered Landscape Architect at Planscape Consultants Ltd, a consultancy specialising in landscape architecture and landscape planning services to both the public and private sector.

Ryan is a Chartered Member of the Landscape Institute (CMLI) and has worked as a Landscape Architect since 2013, receiving Chartered Membership status in 2018. He holds an Honours Degree in Landscape Architecture from Writtle University College and a Master's Degree in Land Reclamation and Restoration from Cranfield University.

Prior to establishing Planscape Consultants Ltd in November 2023, Ryan spent over ten years working across both the public and private sectors undertaking and reviewing numerous Landscape and Visual Impact Assessments (LVIA) and providing landscape advice on a wide range of development proposals including residential, commercial, mixed-use, renewable energy and major infrastructure projects.

This Statement has been prepared in accordance with the Landscape Institute Code of Practice (December 2021) and represents Ryan's independent professional opinion on landscape and visual matters relating to the appeal proposal.

Scope of Work

For the purposes of this review, particular focus has been given to the section of the proposed overhead line alignment extending between the proposed sealing end compound (Figure 1) at TB35 and TB50 east of Fordstreet. This section traverses the Colne Valley between West Bergholt, Eight Ash Green, Fordham and Fordstreet and represents an area within which the proposed pylons would be closely associated with the valley landscape. The review therefore concentrates on the landscape and visual receptors within approximately 2km of the alignment, including the Essex Way, surrounding PRow network, local communities and local roads.

This note provides an independent professional review of landscape and visual matters associated with the proposed overhead line alignment through the Colne Valley corridor, with particular regard to:

- the sensitivity of the Colne Valley landscape
- landscape character effects
- visual amenity effects
- impacts on the setting of the Dedham Value National Landscape
- and the justification for the extent of proposed undergrounding relative to adjacent sections of the route.

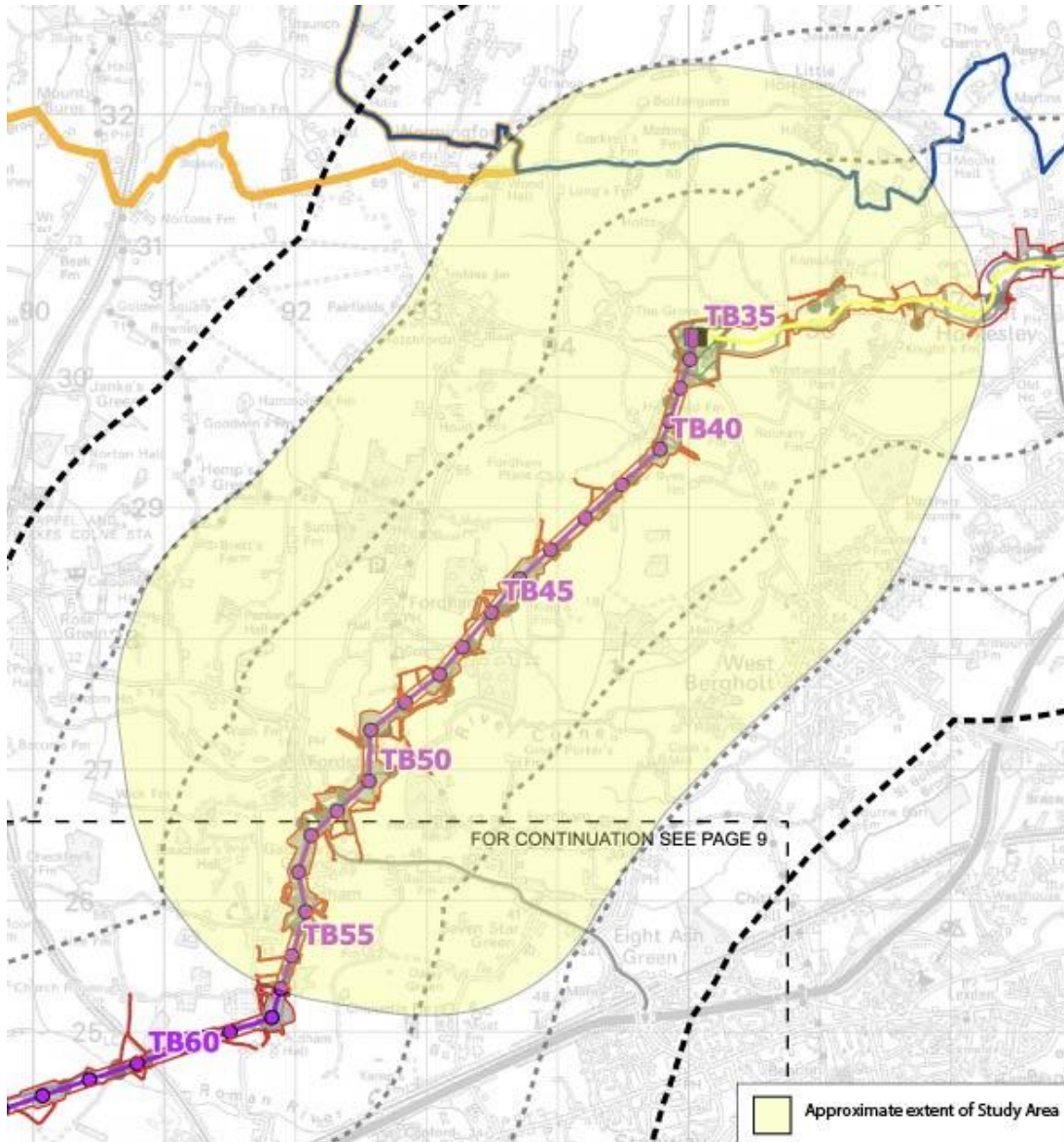


Figure 1: Technical Note Study Area overlay (Extract from: Figure 13.1 – Landscape and Visual – LVIA Study Area and Landscape Designations Page 8 of 13 – Drawing no. 10059280-ARC-ELS-ZZ-DR-ZZ-00238)

This review has been informed by the submitted Environmental Statement (ES), including the Landscape and Visual Impact Assessment (LVIA), associated visualisations, routing and alternatives appraisal documentation, Examination submissions and Issue Specific Hearing discussions.

The purpose of the note is not to revisit the principle of strategic grid reinforcement, nor to seek to re-assess the entirety of the Applicant’s LVIA. Rather, the focus is to consider whether the submitted evidence appropriately reflects the sensitivity of the Colne Valley landscape and whether the extent of likely landscape and visual effects, together with the justification for the chosen overhead alignment and extent of undergrounding, have been sufficiently explained and evidenced.

It is acknowledged that the Examination process is now well advanced and that the Applicant has undertaken extensive assessment work. Nevertheless, the submitted documentation itself identifies a number of highly sensitive landscape and visual receptors and acknowledges significant adverse effects in several locations. This note therefore seeks to assist the Examining Inspector by drawing together relevant landscape and visual considerations specific to the Colne Valley corridor.



2 Policy Context

The assessment of landscape and visual effects for nationally significant infrastructure projects is principally guided by National Policy Statements EN-1 and EN-5, together with established landscape assessment guidance including:

- Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3)
- Landscape Institute Technical Guidance Notes
- and relevant local landscape evidence and character assessments.

National Policy Statement EN-1 establishes the overarching policy framework for nationally significant energy infrastructure and confirms that landscape and visual impacts are important considerations in the assessment of energy projects. Paragraphs relating to good design, environmental protection and effects on landscape character require decision-makers to consider the extent to which proposals respond appropriately to local landscape context, avoid unacceptable adverse impacts and minimise harm through sensitive siting, routeing and mitigation.

National Policy Statement EN-5 provides more detailed policy guidance specifically relating to electricity transmission infrastructure. EN-5 recognises that overhead electricity lines can give rise to substantial landscape and visual effects due to their scale, verticality and geographic extent and therefore requires careful consideration of routeing, alignment and mitigation measures throughout the design process.

In relation to EN-5, two related, but distinct, landscape considerations are relevant to this section of the route;

The first relates to the effects of the proposed infrastructure on the Dedham Vale National Landscape and its setting. The second relates to the effects on the Colne Valley itself, which, whilst undesignated, exhibits many of the characteristics associated with a valued and highly sensitive landscape.

National Policy Statement EN-5 affords substantial weight to the protection of nationally designated landscapes. Paragraph 2.9.21 states that National Parks, the Broads and National Landscapes have the highest status of protection in relation to landscape and scenic beauty. The policy reflects the long-established principle contained within the Holford Rules that major areas of highest amenity value should be avoided altogether where reasonably possible, even where this results in increased route length.

EN-5 recognises that the scale and nature of overhead transmission infrastructure means that residual effects within nationally designated landscapes are unlikely to be acceptable in planning terms except in exceptional circumstances. The policy therefore establishes a strong presumption in favour of avoiding designated landscapes and reducing adverse effects through routeing and undergrounding wherever reasonably practicable.

Importantly, the policy also recognises that effects are not limited to the designated landscape itself. The setting of a National Landscape can contribute to its natural beauty, appreciation and experience, and adverse effects on that setting remain relevant considerations when assessing compliance with national policy. This is particularly relevant in the present case given the visual and functional relationship between the Colne Valley and the Dedham Vale National Landscape, and the extent to which views from the National Landscape and its setting extend across the wider valley landscape.

The second issue is in reference to the value and sensitivity of the Colne Valley itself. Whilst the Colne Valley does not benefit from national landscape designation, EN-5 does not restrict consideration of undergrounding solely to designated landscapes. Paragraph 2.9.14 specifically recognises that where the nature or routeing of an overhead line is likely to result in particularly significant landscape and visual impacts, applicants should demonstrate that due consideration has been given to feasible alternatives, including rerouting or undergrounding, taking account of landscape, visual, environmental, engineering and cost considerations.

The policy therefore recognises that undesignated landscapes may nevertheless possess qualities and characteristics which render them highly sensitive to overhead transmission infrastructure. This is consistent



with GLVIA3 and Landscape Institute Technical Guidance Note 02/21, which make clear that valued landscapes are not limited to designated areas and may derive value from scenic quality, tranquillity, recreational use, cultural associations, perceptual qualities, distinctiveness and sense of place.

This Technical Note will demonstrate that the Colne Valley exhibits many of the characteristics which informed the designation of the adjoining Dedham Vale landscape and the Stour Valley Project Area, including strong valley landform, wooded skylines, rural character, historic settlement pattern, recreational value and high scenic quality. In these circumstances, there is a question as to whether sufficient weight has been afforded to landscape considerations when determining the extent of undergrounding through this section of the route and whether the proposed overhead alignment represents the least harmful reasonable option in accordance with the objectives of EN-5.

3 Colne Valley Landscape

River valley landscapes are typically experienced as integrated and interrelated landscape systems in which landform, valley sides, floodplain, vegetation structure, settlement pattern and perceptual qualities collectively contribute to landscape character, value and sensitivity. Their sensitivity often arises not from any single feature in isolation, but from the way these elements combine to create coherent and recognisable landscapes with strong visual, physical and experiential relationships.

The Colne Valley forms a distinctive and sensitive river valley landscape to the north-east of Colchester between West Bergholt and Fordham. Although not nationally designated, the valley exhibits many of the characteristics commonly associated with valued river valley landscapes, including strong landform, a coherent relationship between topography and settlement pattern, a well-developed network of hedgerows, woodland and watercourses, and a strong sense of transition between urban edge and open countryside. The valley also performs an important role in providing separation, landscape setting and recreational opportunity in close proximity to the urban edge of Colchester.

The landscape is characterised by rolling and sloping valley sides, enclosed and partially wooded skylines, hedgerow field patterns, rural lanes, small pasture fields and a dispersed pattern of historic settlement and farmsteads. Woodland blocks, riparian vegetation and mature hedgerow trees combine to create a varied and layered landscape structure which frequently limits and filters views, whilst simultaneously creating a strong sense of enclosure and landscape cohesion. The interaction between landform, vegetation and settlement pattern is particularly important in defining local character, with settlements typically occupying elevated or transitional positions above the valley floor and responding to the underlying topography.

The valley possesses a strong recreational and perceptual character. Whilst influenced in places by infrastructure and the urban edge of Colchester, substantial parts of the valley retain a predominantly rural character with a clear perception of separation from the urban area as shown on Figure 2 and 3. The landscape is frequently experienced along narrow rural lanes and PROWs, including the Essex Way, where changing topography, woodland structure and landform create sequential and often elevated views across the valley corridor. These routes allow appreciation of the valley as a coherent landscape system rather than as isolated visual components.



Figure 2: View South-East across Colne Valley Landscape ((Site visit date: 21/05/2026) Co-ordinates: 51.92761° N, 0.82209° E)). Comparable to ES Visual Assessment - Viewpoint 4.14: Fordham Road, north-east of Fordham (View Direction 135)



Figure 3: View North-West from PRoW ((Site visit date: 21/05/2026) Co-ordinates: 51.91890° N, 0.83154° E)) Comparable to ES Visual Assessment - Viewpoint 4.05: PRoW near Hillhouse Wood, west of West Bergholt (West Bergholt 5) (View Direction 269)

The valley supports a number of recreational routes and destinations which contribute to its value and public enjoyment. Hillhouse Wood, is a well-used area of publicly accessible woodland which provides opportunities for informal recreation and appreciation of the valley landscape. The wider Fordham Hall Estate and associated Woodland Trust landholdings similarly contribute to public access, biodiversity and landscape experience, whilst also containing areas of archaeological interest, including the discovery of Roman burials (known locally as 'The Dig' (Figure 4)) and evidence of prehistoric activity which reflect the long-standing relationship between people and the valley landscape. The Essex Way long-distance route attracts walkers from across Essex and beyond and provides opportunities to experience the valley's varied landform, woodland structure and rural character. Collectively, these assets reinforce the role of the valley as an important recreational landscape in close proximity to Colchester and contribute to the wider appreciation of its scenic and rural qualities.



Figure 4: View south from the Fordham Hall Community Archaeological Site 'The Dig' ((Site visit date: 21/05/2026) Coordinates: 51.91462° N, 0.80512° E)). Closest comparable view from Environmental Statement Visual Assessment - Viewpoint 4.30: Mill Road, south of Fordham (View Direction 167)

Historic settlements including West Bergholt, Fordham and Fordstreet occupy elevated and transitional positions associated with the underlying valley landform, reflecting the long-standing relationship between settlement and topography. A number of listed buildings and heritage assets derive part of their significance from their relationship with the surrounding landscape, including Cooks Hall (Grade II*), Highfields Farmhouse (Grade II), King's Farmhouse (Grade II), Coney Byes (Grade II) and the Church of St Mary, Fordham (Grade I). The Church of St Mary occupies a visually prominent position within the valley and forms a notable landmark within the wider landscape.

The valley also performs a wider functional role as part of a green infrastructure corridor associated with the River Colne. The network of PRoW, woodland, pasture and riparian habitats contributes to ecological connectivity and recreational accessibility, whilst the valley landscape itself provides an important setting to surrounding settlements, heritage assets and areas of public access. The contrast between the enclosed valley corridor and the surrounding higher farmland further contributes to local distinctiveness and reinforces the legibility of the valley landform.



The valley also appears to perform a wider functional role as part of a green infrastructure corridor associated with the River Colne. The network of PRoW, woodland, pasture and riparian habitats contributes to ecological connectivity and recreational accessibility, whilst the valley landscape itself provides an important setting to surrounding settlements and heritage features. The contrast between the enclosed valley corridor and the surrounding higher farmland further contributes to local distinctiveness and reinforces the legibility of the valley landform.

The Applicant's own baseline assessment identifies the relevant landscape character areas as being of high sensitivity. This is an important acknowledgement, particularly given that the submitted visual material demonstrates that, in many locations, the proposed pylons would introduce infrastructure into landscapes presently absent of comparable overhead electricity transmission infrastructure. This has particular relevance within river valley landscapes where elevated infrastructure can become visually prominent across broad areas and where pylons may

Landscape Value

Landscape value is an important component of landscape assessment and forms a key consideration in the assessment of effects arising from major infrastructure projects. This matter has been specifically raised during examination of the Norwich to Tilbury project. In particular, Document 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points responded to the Inspector's request made during Day 2 of ISH2 (29 April 2026, Agenda Item 8: Landscape and Visual Effects), which sought clarification regarding the application of Landscape Institute Technical Guidance Note 02/21 and requested an example of where the guidance had materially influenced routing decisions or the proposed alignment.

The Inspector's request reflects the increasing importance afforded to landscape value within both national policy and professional guidance. Whilst nationally designated landscapes such as National Parks and National Landscapes are afforded the highest status of protection in relation to landscape and scenic beauty, GLVIA3 and subsequent Landscape Institute guidance make clear that landscapes outside of national designation can also be valued for a wide range of reasons and may therefore be susceptible to significant adverse effects arising from development.

Landscape Institute Technical Guidance Note 02/21 (*Assessing Landscape Value Outside National Designations*) confirms that landscape value may derive from a combination of factors including scenic quality, perceptual qualities, cultural and natural heritage interest, recreational value, rarity, distinctiveness, conservation interest, associations and functional importance. Importantly, the guidance also emphasises that valued landscapes may exist outside nationally designated areas and that value may vary spatially within wider landscape character areas depending on the specific qualities and attributes present.

This is particularly relevant within the context of the Norwich to Tilbury project given the extensive geographic scale of the proposals and the number of sensitive river valleys, historic landscapes and recreational corridors affected by the route alignment. National Policy Statement EN-5 similarly recognises that significant landscape and visual impacts may arise not only within designated landscapes, but also within other highly sensitive landscapes where the nature or routing of overhead lines could give rise to substantial harm. Paragraph 2.9.14 specifically recognises that where overhead line proposals are likely to result in particularly significant landscape and visual impacts, applicants should demonstrate that due consideration has been given to feasible alternatives, including rerouting or undergrounding, taking account of landscape, visual, environmental, engineering and cost considerations.

Applicants Landscape Value Evaluation

The Applicant's response within Document 8.5.8 and the earlier response to ExQ1 LV1.21 in REP3-074 confirms that Landscape Institute Technical Guidance Note 02/21 was considered as part of the assessment process and routing decisions. It is accepted that the Applicant has recognised the role of landscape value within the assessment of landscape sensitivity and has identified examples where route amendments sought to reduce effects on particular landscape features, including veteran trees, historic field patterns and heritage assets.



However, notwithstanding this, we are of the judgement that the practical application of TGN 02/21 within the assessment of the Colne Valley has been relatively broad and does not fully reflect the experiential, perceptual and locally specific qualities of the landscape corridor directly affected by the proposed alignment.

In particular, whilst the Applicant's assessment judgements have appropriately been structured around the defined study area bands of "Within 0.5km", "Between 0.5–1.5km" and "Beyond 1.5km", the baseline analysis informing these judgements appears to rely heavily on broad Landscape Character Area-scale evaluations. As a consequence, there is concern that the value of the more rural and tranquil sections of the Colne Valley directly affected by the proposals may be moderated or diluted through averaging across wider LCAs containing varying levels of urban influence, tranquillity, scenic quality and perceptual character.

Document 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment identifies both the Colne River Valley Floor and Colne River Valley Slopes as being of medium-high landscape value. The assessment tables identify a number of positive attributes contributing to this judgement, including scenic quality, recreational use, historic character, woodland cover, river corridor qualities and perceptual attributes. However, it is notable that no landscape receptors within this part of the study area are identified as being of high value despite many of the characteristics described within the baseline closely aligning with the Applicant's own criteria for higher value landscapes set out within Document 6.13.A1 Environmental Statement Appendix 13.1 – Landscape and Visual Methodology.

The methodology document explains that higher value landscapes are likely to display a strong sense of place, scenic quality, intact character, perceptual qualities including tranquillity, recreational importance, cultural associations and a high degree of rarity or distinctiveness. Many of these characteristics are evident within the Colne Valley corridor, particularly within the central rural sections through which the proposed pylon alignment passes.

This appears particularly relevant within the Colne Valley corridor where the proposed alignment passes through the more rural and tranquil central sections of the valley landscape, rather than the more urban-influenced edges associated with Colchester. The immediate route corridor and surrounding landscape within the principal area of influence display notably stronger perceptual and experiential qualities than the wider LCA as a whole, including greater tranquillity and rural character, stronger enclosure associated with wooded valley sides and riparian vegetation, more pronounced scenic quality and cross-valley intervisibility, extensive recreational use through the Essex Way and wider PRoW network, and a comparatively limited presence of existing large-scale transmission infrastructure.

For example, the Applicant's assessment of perceptual qualities acknowledges that "there is a perception of tranquillity in rural areas, away from the edge of Colchester", yet the resulting value judgement remains moderated by the wider Landscape Character Area context. In practice, however, the proposed alignment passes directly through those quieter and more rural sections of the valley where tranquillity, enclosure and rural character are most strongly expressed.

Similarly, the route corridor itself contains many of the characteristics associated with valued landscapes under TGN 02/21, including strong scenic quality associated with the enclosed valley landform and wooded skylines, extensive recreational use through the Essex Way and wider PRoW network, historic settlement relationships and cultural associations, a strong sense of place and landscape cohesion, relative tranquillity and separation from urban influences, and a comparatively limited presence of existing large-scale transmission infrastructure.

As such, the Applicant's use of broad LCA-scale and study area-scale judgements appears to not sufficiently recognise the higher value and susceptibility of the specific landscape corridor experiencing direct effects from the proposed overhead line infrastructure. TGN 02/21 supports a more nuanced understanding of how value may vary spatially within wider landscapes, particularly where development affects the more valued or sensitive portions of a landscape.



This distinction is important because landscape value directly informs overall landscape sensitivity. If the value of the Colne Valley corridor has been moderated through reliance on broad LCA-scale judgements, then the resulting sensitivity and significance judgements may similarly understate the likely effects arising from the introduction of large-scale overhead line infrastructure.

Our Landscape Value Evaluation

In the case of the Colne Valley, the principal concern relates not simply to the presence of individual valued elements, but to the combined experience of the valley landscape, including its enclosed river corridor, wooded valley sides, historic settlement relationship, relative tranquillity, recreational use and cohesive visual composition. The introduction of substantial overhead line infrastructure and pylons has the potential to alter these qualities across a broad geographic area, including through skyline intrusion, increased visual prominence, erosion of perceived remoteness and changes to the experiential qualities of the valley corridor.

Consequently, whilst it is accepted that the Applicant has referenced and considered TGN 02/21 within the assessment process, the conclusions reached in relation to landscape value within the Colne Valley do not fully reflect either the intent of the guidance or the characteristics of the landscape most directly affected by the proposed route alignment.

The following review therefore considers the value of the Colne Valley corridor against the factors identified within Landscape Institute Technical Guidance Note 02/21 and the landscape value criteria set out within the Applicant's own Landscape and Visual Methodology (Document 6.13.A1 Environmental Statement Appendix 13.1 – Landscape and Visual Methodology).

Table 1: Colne Valley Landscape Value Appraisal

<i>Landscape Value Factor</i>	<i>Description</i>
Natural Heritage	<p>The Colne Valley corridor contains a strong network of semi-natural landscape features associated with the River Colne and its tributary valley slopes, including riparian vegetation, mature hedgerows, hedgerow trees, woodland belts and pastoral land cover which collectively contribute to a cohesive and ecologically connected valley landscape.</p> <p>The wooded aspects of the valley form a defining component of the landscape structure and contribute strongly to local character, enclosure and scenic quality.</p> <p>The corridor contains areas of Ancient Woodland, including Hillhouse Wood, together with areas of deciduous woodland priority habitat and Local Wildlife Sites such as Alderwoods, which reinforce the ecological and landscape value of the valley corridor. These features contribute positively to biodiversity, ecological connectivity and the wider multifunctional green infrastructure network extending toward the Dedham Vale landscape.</p> <p>The landscape also performs an important role within a wider multifunctional green infrastructure and ecological network linking urban and rural landscapes and extending toward the Dedham Vale.</p> <p>The combination of river valley landform, extensive vegetation structure, ecological connectivity and characteristic semi-natural habitats contributes strongly to the natural heritage value of the landscape. Overall, natural heritage value is therefore considered to be high.</p>
Cultural Heritage	<p>The Colne Valley displays a strong relationship between historic settlement pattern, landform and rural landscape structure, with settlements including</p>



	<p>West Bergholt, Fordham and Fordstreet occupying elevated or transitional positions associated with the valley landform. Historic churches, farmsteads, rural lanes and surviving field patterns contribute to a clear sense of time depth and reinforce the historic evolution of the valley landscape.</p> <p>The landscape also contributes to the setting and significance of a number of heritage assets within and adjoining the route corridor, including Cooks Hall (Grade II*), Highfields Farmhouse (Grade II), King's Farmhouse (Grade II), Coney Byes (Grade II) and the Church of St Mary (Grade I). These assets are frequently experienced in association with the surrounding valley slopes and open agricultural land, with views across the valley forming an important component of their rural setting and wider landscape context.</p> <p>Whilst the landscape does not contain an extensive concentration of nationally exceptional heritage features or designed landscapes, it nevertheless possesses a strong degree of cultural continuity and historic landscape interest which contributes to the wider appreciation of the valley corridor and its transition toward the Dedham Vale landscape. Cultural heritage value is therefore considered to be medium-high.</p>
Landscape Condition	<p>Many landscape elements remain in good physical condition, including mature hedgerow boundaries, woodlands and surviving historic field patterns which collectively contribute to a strong landscape framework. The enclosed and wooded character of the valley also assists in maintaining a recognisable and relatively intact rural landscape composition despite proximity to Colchester.</p> <p>Whilst some detracting influences are present locally, including minor transport corridors, agricultural infrastructure and equestrian uses, these generally do not dominate the central valley corridor through which the proposed alignment would pass. Importantly, substantial parts of the corridor currently contain a limited presence of existing energy infrastructure or industrial features, contributing positively to landscape integrity, visual amenity and perceptual quality.</p> <p>The combination of intact landscape structure, strong landform legibility, mature vegetation framework and the relative absence of incongruous features contributes to a landscape of generally good condition. Overall, landscape condition is therefore considered to be medium-high.</p>
Associations	<p>The valley has strong local associations as an important recreational, historic and scenic landscape corridor north-east of Colchester and contributes significantly to the rural identity of settlements including West Bergholt, Fordham and Fordstreet. The Essex Way long-distance route, Hillhouse Wood and the Woodland Trust's Fordham Hall Estate are all closely associated with public enjoyment and appreciation of the landscape and attract visitors from across Essex and the wider region. The corridor also contains local archaeological interest, including Roman burials and evidence of prehistoric activity within the Fordham Hall Estate, together with historic associations linked to Cooks Hall and Thomas Abel, chaplain to Katherine of Aragon.</p> <p>Whilst the landscape does not appear to possess nationally recognised literary, artistic or cultural associations comparable to those found within parts of the Dedham Vale and wider Stour Valley, it nevertheless exhibits a degree of local and regional cultural, recreational and historical association which contributes positively to its identity and appreciation. Overall</p>



	<p>associative value is therefore considered to be medium.</p>
<p>Distinctiveness</p>	<p>The Colne Valley possesses a strong and recognisable sense of place arising from the combination of rolling valley landform, wooded skylines, mature hedgerow structure, rural lanes and historic settlement pattern. The relationship between valley floor, valley slopes and surrounding settlements creates a coherent and legible landscape character that contributes to a strong local identity.</p> <p>Visual contrasts between enclosed wooded valley sections and more open elevated views contribute to landscape and experiential interest, whilst the valley itself forms an important component of the rural setting and identity of settlements including West Bergholt, Fordham and Fordstreet. Whilst the landscape does not necessarily contain rare or nationally unusual features, the combination and expression of landscape characteristics within the corridor creates a distinctive and locally important river valley landscape with a strong sense of place. The distinctiveness of the landscape is therefore considered to be medium-high.</p>
<p>Recreational</p>	<p>The Colne Valley is connected by an extensive PRoW network and a series of rural lanes and informal routes which allow appreciation of the valley landscape and its scenic qualities. Public footpaths frequently cross or follow elevated valley slopes, wooded edges and river crossings, providing opportunities for sequential and changing views across the valley corridor and toward surrounding skylines, heritage features and historic settlements.</p> <p>The Essex Way in particular forms an important long-distance recreational route where appreciation of landscape character, scenic quality and rural setting is a key component of the user experience. Recreational destinations such as Hillhouse Wood, and the wider Fordham Hall Estate further contribute to the valley's attractiveness and provide opportunities for residents and visitors to experience the landscape, woodland character and natural heritage of the River Colne corridor.</p> <p>The landscape itself therefore forms an integral component of the recreational experience, with the valley's scenic composition, framed views, wooded skylines, historic landscape features and changing landform contributing directly to the enjoyment of walking and outdoor recreation. The importance of the landscape to the recreational experience is reflected in the popularity of the Essex Way, Hillhouse Wood and the wider Fordham Hall Estate (See Figure 5). Recreational value is therefore considered to be high.</p>
<p>Perceptual (Scenic)</p>	<p>Scenic qualities within the Colne Valley arise from the interaction between rolling valley landform, wooded skylines, mature vegetation structure and the strong visual relationship between valley floor, slopes and historic settlements. The landscape displays a combination of pasture, woodland, hedgerows, riparian vegetation and rural settlements which collectively contribute to a coherent and visually attractive valley landscape.</p> <p>Visual interest is further enhanced by the contrast between enclosed wooded valley sections and more open elevated slopes which allow expansive views across the valley corridor and toward surrounding skylines.</p> <p>The route corridor also benefits from a limited presence of energy and industrial infrastructure, particularly within the more enclosed and rural</p>



	<p>sections of the valley. This contributes positively to the appreciation of the valley's rural composition and scenic qualities.</p> <p>In combination, the strong valley landform, wooded skylines, framed views, visual contrasts and recognisable landscape features contribute to a highly scenic and distinctive river valley landscape. Scenic value is therefore considered to be high.</p>
Perceptual (Tranquillity)	<p>Despite some localised infrastructure influences, substantial parts of the valley corridor retain a notably tranquil and rural character.</p> <p>The enclosed nature of the valley landform, mature woodland structure, riparian vegetation and limited urban influence within the central valley corridor contribute to a strong perception of separation from the surrounding urban edge. Narrow rural lanes, filtered views, limited built form and relatively low levels of movement and activity within the valley floor and wooded slopes reinforce the quieter and more enclosed character of the landscape.</p> <p>In many locations, the route corridor possesses noticeably stronger tranquillity and perceptual enclosure than the wider LCA assessment may suggest. Whilst the landscape is not remote and does contain some localised infrastructure influences, the central sections of the valley retain relatively few overtly urbanising influences.</p> <p>The combination of enclosed landform, extensive vegetation structure, relative absence of incongruous development contributes positively to tranquillity. Overall perceptual value in relation to tranquillity and rural character is considered to be medium-high.</p>

Collectively, the above factors indicate that the immediate Colne Valley corridor between exhibits a strong combination of characteristics commonly associated with valued landscapes under Landscape Institute Technical Guidance Note 02/21. In particular, the corridor displays strong scenic and perceptual qualities, a coherent and legible valley landform, recreational importance, historic settlement relationships, tranquillity and a strong sense of place and rural identity.

Whilst the Applicant's assessment identifies the wider LCAs as being of medium-high value overall, the broader scale of assessment may moderate or dilute the value of the specific areas directly affected by the proposed alignment. In this respect, the immediate route corridor appears to exhibit characteristics more closely aligned with higher landscape value than is reflected within the wider baseline assessment presented within the Environmental Statement.

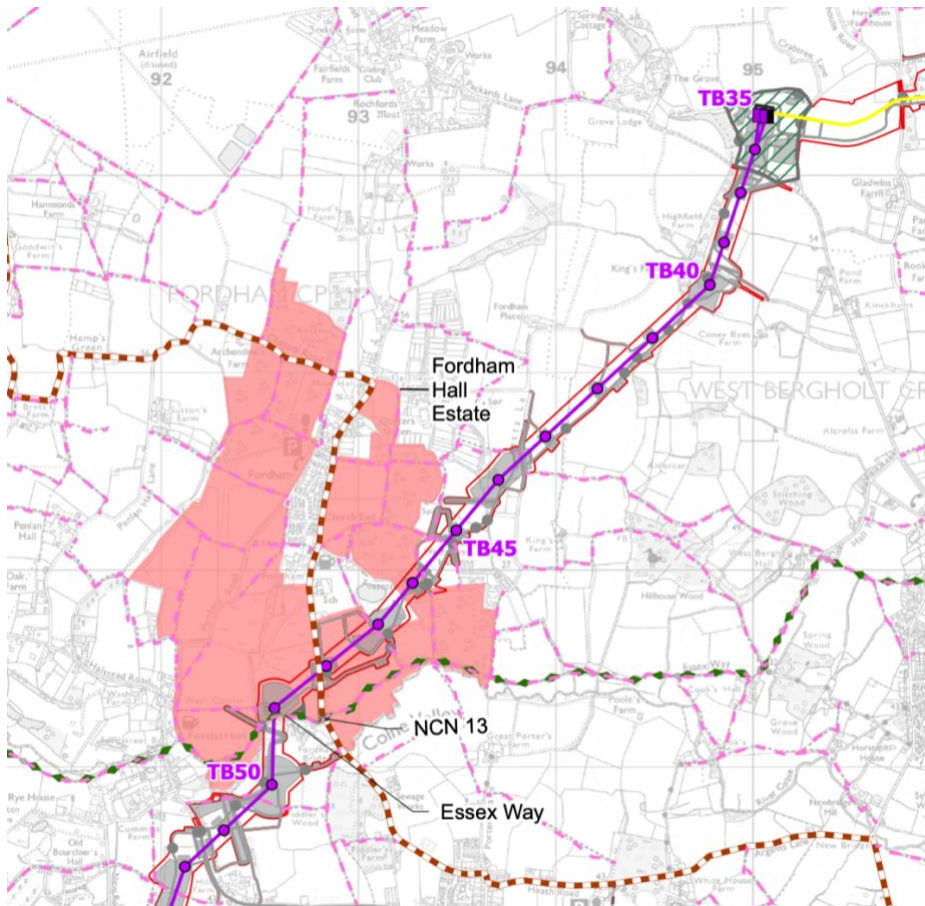


Figure 5: Colne Valley Recreational Receptors (Extract from: Figure 15.3 - Socio-economics, Recreation and Tourism - Recreational Land and Recreational Routes Page 15 of 24 – Drawing no. 10059280-ARC-EGN-ZZ-DR-ZZ-00292)

4 Review of Applicant’s LVIA Findings

The submitted LVIA acknowledges a number of significant adverse landscape and visual effects associated with the proposed overhead pylons through the Colne Valley corridor. The Applicant’s own baseline assessment identifies the Colne River Valley Slopes and Colne River Valley Floor landscape character areas as receptors of high sensitivity, whilst the visual assessment also acknowledges significant visual effects affecting a range of receptor groups including PRoW users and residential properties.

The relevant question at Examination stage is therefore not whether effects can be entirely avoided, but whether the sensitivity and value of the affected landscape have been appropriately reflected within the assessment process and whether the chosen route alignment and extent of undergrounding represent the least harmful reasonable option through this section of the corridor.

Landscape Effects

The Applicant’s own assessment identifies substantial adverse effects on the character and perception of the Colne Valley landscape arising from both construction and operation of the proposed overhead alignment through LCA A5: Colne River Valley Slopes and LCA A4: Colne River Valley Floors. In both cases, the Applicant identifies the landscape as being of high sensitivity due to the pronounced valley landform, open and attractive views across the valley corridor, historic settlement pattern, recreational use, woodland structure and perceived tranquillity of the landscape.

Within LCA A5: Colne River Valley Slopes, the assessment acknowledges that the overhead alignment would introduce infrastructure into a landscape otherwise relatively absent of notable modern infrastructure and



would affect the sense of openness identified as a key characteristic of the valley landscape. The Environmental Statement specifically recognises that pylons would appear prominently on valley slopes and ridgelines, including where the route ascends the slopes east of Fordham and crosses the intricately wooded valley sides associated with the River Colne corridor.

The Applicant concludes that the Project would result in major and significant (adverse) effects within 0.5km of the alignment and moderate and significant (adverse) effects within 1.5km during both construction and operation, including at Year 15 following mitigation. Importantly, the assessment identifies that the magnitude and significance of effects would remain unchanged at Year 15.

Similarly, within LCA A4: Colne River Valley Floors, the Applicant identifies high susceptibility arising from the strong character associated with the River Colne floodplain, the smaller-scale field patterns, historic mills and weirs, views along the river corridor and the perception of tranquillity within the rural valley landscape. The assessment acknowledges that the proposed overhead line would become a prominent feature crossing the river valley and would affect the narrow meandering river corridor identified as a key characteristic of the landscape. It also confirms that pylons would appear above the treeline, interrupt field boundaries and become noticeable skyline features where the alignment ascends the valley slopes.

Again, the Applicant concludes that effects would remain major and significant (adverse) within 0.5km and moderate and significant (adverse) within 1.5km throughout construction and operation, including at Year 15.

These findings are important because they demonstrate that the Applicant itself acknowledges the high sensitivity of the receiving landscape, the substantial nature of the likely long-term effects and the inability to materially reduce effects over time within this section of the route corridor.

Given the acknowledged value and sensitivity of the receiving landscape, together with the scale, and significance of the identified effects, it is reasonable to question why this particular alignment was selected and whether sufficient weight was afforded to landscape and visual considerations during route selection. In particular, the extent of undergrounding and other avoidance measures has not been fully justified when considered against the effects identified by the Applicant's own assessment.

Visual Effects

As well as significant adverse effects on landscape receptors, the Applicant's assessment identifies significant visual effects affecting a number of visual receptor groups too, including receptors associated with the Essex Way and wider PRoW network, together with residential and recreational receptors experiencing elevated and open views across the valley corridor. The assessment also acknowledges a number of recurring effect characteristics including:

- skyline visibility
- extensive views of pylons
- introduction of infrastructure into views presently absent of comparable electrical infrastructure
- and the perception of stacked or layered infrastructure within wider landscape views.

These acknowledgements are important because they indicate that the likely effects are not simply localised or short-term in nature but relate fundamentally to the introduction of vertical infrastructure into a sensitive river valley landscape.

The submitted visualisations and assessment narrative demonstrate that in many locations pylons would remain clearly perceptible above vegetation and woodland canopies and would frequently occupy elevated positions within the wider valley landscape. This is particularly evident within views experienced from VP 4.05, 4.14, 4.24, 4.25 and 4.30 where the relationship between valley landform, wooded skylines and open agricultural slopes currently forms an important component of the visual experience.

This conclusion is reinforced by the Applicant's own visual assessment findings. The assessment identifies major adverse effects from Viewpoints 4.14, 4.24, 4.25 and 4.30 (Document: 6.13.A3 Environmental Statement Appendix 13.3 – Visual Baseline and Assessment - Part 3), demonstrating that in a number of



locations the proposed pylons would become prominent and defining features within views across the wider valley landscape.

Particular consideration should also be given to Viewpoint 4.05, located on a PRoW near Hillhouse Wood. Whilst the Applicant assesses the receptor as being of medium sensitivity, with a medium magnitude of change resulting in a moderate adverse effect, we are of the opinion that this judgement may understate the importance of the view and the susceptibility of the receptor to change. The route forms part of a well-used recreational corridor where appreciation of the surrounding landscape is a key component of the user experience.

Although the proposed pylons would be experienced in mid-distance views, they would extend extensively across the view and introduce a prominent linear corridor of infrastructure into a landscape currently characterised by its rural qualities and relative absence of comparable infrastructure. In this respect, the visual influence of the overhead line is not derived solely from the proximity of individual pylons, but from the horizontal extent of the infrastructure and its interaction with the wider valley panorama. Given the recreational nature of the receptor and the importance of landscape appreciation to the user experience, there is a justifiable basis to conclude that the effects at this location may be greater than those presented within the assessment.

The effects on residential receptors should also be considered collectively within the wider landscape context. Whilst Residential Visual Amenity Assessment is generally reserved for exceptionally overbearing effects, the cumulative experience of infrastructure across the valley corridor remains relevant when considering overall visual amenity, recreational experience and the perception of landscape change experienced by communities living within and moving through the valley landscape.

This is particularly important where many residential properties currently experience a predominantly rural outlook characterised by open views across valley slopes, wooded skylines, agricultural land and the wider river valley landscape. For these residents, the proposed development would not simply result in a change to a single view, but would introduce a new and permanent industrial feature into the wider landscape setting experienced on a daily basis.

Overall, whilst the Applicant's assessment acknowledges significant adverse visual effects within the Colne Valley, there remains significant professional concern that the cumulative and sequential effects experienced by receptors moving through the landscape may be understated in places. The proposed pylons would not be experienced solely as isolated features within individual views, but as a recurring and prominent element across a number of viewpoints, PRoW and recreational routes throughout the valley corridor. As a result, the effects on visual amenity extend beyond individual receptor locations and influence the wider experience and enjoyment of the landscape.

5 Impacts on the Setting of the Dedham Vale National Landscape

The proposed route corridor between the sealing end compound and Fordstreet forms part of the wider transitional landscape extending south from the Dedham Vale toward Colchester. The landscape shares a number of characteristics commonly associated with the wider Stour and Dedham valley landscape, including valley landform, wooded skylines, mature hedgerow structure, rural lanes, historic settlement pattern and elevated panoramic views across interrelated valley landscapes.

Importantly, the National Landscape (NL) qualities do not necessarily terminate at the designation boundary. Rather, the surrounding countryside contributes to the appreciation, setting and approach to the designated landscape, including views toward and away from the Dedham Vale and the continuity of rural valley character extending beyond the NL itself.

National Policy Statement EN-5 affords National Landscapes the highest status of protection in relation to landscape and scenic beauty. The policy expectation is clear that such landscapes should be avoided altogether where possible and that adverse effects should be minimised through routeing and design. In this context, the issue is not simply whether effects within the National Landscape are assessed as significant in EIA terms, but



whether the proposals adequately conserve and enhance the natural beauty, setting and appreciation of the National Landscape.

The Applicant itself acknowledges that effects on National Landscapes can arise from infrastructure located outside the designated boundary. This is especially relevant in the present case due to the elevated and intervisible nature of the surrounding valley landscapes, the strong relationship between skylines, valley slopes and settlement edges, and the sequential experience of views when travelling through the wider countryside surrounding the Dedham Vale.

There is concern that the assessment of effects on the setting of the National Landscape relies heavily on a limited number of viewpoints and does not fully capture the wider visual relationship between the proposed infrastructure and the National Landscape. For example, whilst Viewpoint 4.13 at Wormingford has been used to inform the assessment, views toward the sealing end compound and the overhead alignment are not confined to this location. Similar views are available from a wider range of locations within and around the National Landscape, including potential views along Little Horkesley Road (51.94895° N, 0.81910° E).

The Applicant assesses effects from Viewpoint 4.13 as Minor Adverse during construction and operation. Whilst it is acknowledged that the proposed pylons would be experienced within mid/long-distance views, they would nevertheless introduce new vertical and horizontal infrastructure into an otherwise predominantly rural valley panorama. The pylons, conductors and associated wirescape would extend across the view and introduce a clearly perceptible industrial element into the landscape. Given the acknowledged sensitivity of the visual receptor and the importance of scenic quality and natural beauty to the purpose of the National Landscape, there is concern that a minor adverse judgement understates the extent of visual change and the influence of the proposed infrastructure on the appreciation of the wider landscape setting.

Furthermore, the significance of effects on the National Landscape should not be considered solely through EIA significance thresholds. The Dedham Vale National Landscape and Stour Valley Partnership has specifically noted that even where effects are assessed as not significant in EIA terms, adverse effects nevertheless remain harmful and do not contribute to the statutory purpose of conserving and enhancing natural beauty. This distinction is important. The question is not simply whether effects reach the threshold of significance within the EIA, but whether the proposals conserve and enhance the natural beauty, setting and experience of the National Landscape in accordance with national policy.

Accordingly, there remains concern that the effects on the setting, appreciation and experience of the Dedham Vale National Landscape have not been fully reflected within the routeing proposals. Given the acknowledged sensitivity and national importance of the landscape, together with the visual and functional relationship between the Dedham Vale and the adjoining Colne Valley corridor, it is considered that the evidence currently before the Examination does not adequately demonstrate that effects on the National Landscape and its setting have been avoided or minimised to the fullest extent reasonably possible in accordance with the objectives of National Policy Statement EN-5.

6 Undergrounding and Route Selection Considerations

The submitted alternatives appraisal demonstrates that the Applicant has undertaken routeing and design development work in response to engineering, environmental and technical constraints. The Applicant also places reliance upon established routeing principles, including the Holford Rules, in support of the chosen alignment.

However, notwithstanding the assessment work undertaken, there remains concern that the route selection and undergrounding appraisal gives disproportionate weight to engineering efficiency, deliverability and cost considerations relative to the sensitivity of the landscape and the extent of likely long-term landscape and visual significant adverse impact.

National Policy Statement EN-5 recognises that overhead electricity transmission infrastructure can give rise to substantial landscape and visual effects and requires careful consideration of routeing, mitigation and



alternative solutions. Paragraph 2.9.14 specifically states that where the nature or route of an overhead line is likely to result in particularly significant landscape and visual impacts, applicants should demonstrate that they have given due consideration to the costs and benefits of feasible alternatives, including rerouting and undergrounding.

In relation to nationally designated landscapes, EN-5 adopts an even stronger position. Paragraph 2.9.21 confirms that National Landscapes have the highest status of protection in relation to landscape and scenic beauty and that major development should be refused other than in exceptional circumstances and where it can be demonstrated to be in the public interest.

The policy also recognises that, because of the serious potential effects of overhead line infrastructure on these landscapes, undergrounding may represent the most appropriate solution. Importantly, when considering effects on nationally designated landscapes, the policy requires consideration of landscape harm and the extent to which that harm can be moderated, rather than simply balancing such effects against project cost.

Whilst the Applicant has sought to respond to this policy position through the undergrounding of the route across the Dedham Vale National Landscape, the proposed transition back to overhead infrastructure immediately beyond the designated landscape raises substantial concerns regarding the extent to which effects on both the setting of the National Landscape and the highly sensitive Colne Valley landscape have been taken into account.

As set out previously within this Technical Note, the Colne Valley corridor between the proposed sealing end compound (Figure 6) and Fordstreet exhibits many of the characteristics associated with valued landscapes under Landscape Institute Technical Guidance Note 02/21, including strong scenic, perceptual and recreational qualities, a coherent valley landform, wooded skylines and a strong sense of place. The Applicant's own assessment identifies the Colne River Valley Slopes and Colne River Valley Floor landscape character areas as receptors of high sensitivity, whilst also identifying a range of highly sensitive visual receptors including residents and PRoW users. Importantly, the Applicant concludes that the proposed overhead alignment would result in major and significant adverse effects within the immediate corridor during construction, operation Year 1 and operation Year 15, acknowledging that these effects would remain for the lifetime of the proposed development.



Figure 6: View across arable fields at proposed Sealing End Compound Location ((Site visit date: 21/05/2026) Co-ordinates: 51.93632° N, 0.83876° E)) Comparable to ES Visual Assessment - Viewpoint 4.34: Crabtree Lane, north of West Bergholt (View Direction 280)

In this context, the transition from underground to overhead infrastructure occurs not within a landscape of lower sensitivity or limited visual influence, but within a corridor that the Applicant itself acknowledges to be highly sensitive and subject to significant landscape and visual effects. Additional undergrounding through the Colne Valley corridor therefore has the potential to materially reduce landscape and visual effects, avoid skyline intrusion, reduce the sequential visibility of pylons across the valley landscape and lessen effects on the setting and appreciation of the Dedham Vale National Landscape. It would also avoid substantial and permanent change to a landscape which the Applicant itself acknowledges to be highly sensitive.

Whilst the submitted material explains why overhead infrastructure may be preferable from an engineering and delivery perspective, it is considerably less convincing in demonstrating why the significant adverse effects identified through the Colne Valley should be accepted, or why additional undergrounding was not pursued further. Accordingly, there remains a professional concern that insufficient weight may have been afforded to landscape sensitivity, and the acknowledged magnitude of landscape and visual effects when determining the extent of undergrounding through this section of the route.

7 Conclusion

In conclusion, the Applicant's own Environmental Statement demonstrates that the Colne Valley represents a highly sensitive river valley landscape and that the proposed overhead alignment would result in significant adverse landscape and visual effects affecting landscape character, residents and PRoW user receptors throughout the operational life of the development. The assessment identifies the Colne River Valley Slopes and Colne River Valley Floor as receptors of high sensitivity and acknowledges major and significant adverse effects within the immediate route corridor which would remain unchanged at Year 15.

The review undertaken within this Technical Note indicates that the corridor between the proposed sealing end compound and Fordstreet exhibits many of the characteristics associated with valued landscapes under Landscape Institute Technical Guidance Note 02/21, including strong scenic, recreational and perceptual



qualities, a legible valley landform, extensive public access and recreational use, historic landscape interest, relative tranquillity and a strong sense of place. These qualities contribute directly to the value and susceptibility of the landscape to large-scale overhead transmission infrastructure and increase the significance of the identified effects.

The proposed overhead alignment would introduce substantial and permanent vertical infrastructure into a landscape presently characterised by its rural qualities, wooded skylines and relative absence of comparable transmission infrastructure. Whilst vegetation and landform may locally filter some views, the Applicant's own assessment and visual material demonstrate that pylons would remain prominent features across valley slopes and skylines and would be experienced sequentially across the wider landscape. The resulting effects extend beyond individual viewpoints and influence the appreciation, character and experience of the Colne Valley as a landscape system.

The proposed route would also result in adverse effects on the setting and appreciation of the Dedham Vale NL. Given the strong visual, physical and perceptual relationship between the Dedham Vale and the adjoining Colne Valley, together with the acknowledged importance of conserving and enhancing natural beauty, there is the view that the extent of these effects and the contribution of the Colne Valley to the wider setting of the NL have not been fully reflected within the routeing proposals.

In light of the acknowledged sensitivity of the receiving landscape, the significant adverse effects identified by the Applicant and the inability of mitigation measures to materially reduce those effects over time, there remains a significant professional concern that insufficient weight has been afforded to landscape value, landscape sensitivity and visual amenity when determining the extent of undergrounding and the acceptability of the proposed overhead alignment.

Accordingly, it is considered that the Examining Authority should give careful consideration to whether the balance between engineering requirements, routeing, landscape and visual effects and undergrounding has been sufficiently justified through this section of the route. Based on the evidence reviewed, it is my professional opinion that the proposed overhead alignment through the Colne Valley does not represent the least harmful reasonable option in landscape and visual terms and that further undergrounding should have been pursued in accordance with the objectives and principles set out within National Policy Statement EN-5.