

PINS Deadline 5, 10th June 2026

Tritton Farming Partnership LLP (TFP), [REDACTED], and its members and related parties [REDACTED], [REDACTED] including; Lowleys Farm and Lions (Lyons) Mineral scheme.

Charles Tritton, TFP Partner, wishes to attend all hearings on the week commencing 22nd June.

TFP notes the responses to TFP points in REP2-029, 8.8.1 Applicant's Comments on Written Representations Pages 129-146. This report is in addition to previous comments and does not replace them.

1. Alternative Technologies

This is highlighted given the enormous technological change in the last 4-6 years when NG first developed its "Preferred Route" as East Anglia Green in 2022. Many other companies are going bust as a result of these changes and others such as Nvidia have increased their value by \$5trillion. Standing still is not an option in these rapidly changing times, yet this project is broadly unchanged and should last over 50 years. All solutions on projects this large should be considered and continuously re-evaluated in light of technology change.

Is a 180km line, mainly of 40-50m steel lattice pylons utilising 1950s technology, really the best the UK/NG can do? This technology is behind Europe and other parts of the UK.

- a. NG is proposing utilising the most damaging environmental, especially visual, solution to transport energy compared to the other main methodologies of subsea cables, underground cabling, increasing existing pylon capacities with new conductors and cables, or replacing old pylons with new pylons, conductors and cables.
- b. NG has not made any technological changes since East Anglia Green began 4-6 years ago.
- c. Large steel lattice pylons are no longer widely adopted in the Western World at scale in populated areas.
- d. Very little analysis has been shown of combining partial onshore and offshore routes in this project. One solution may not fit all, e.g: pylons in low density areas in Norfolk and then offshore in populated Essex.

What energy transmission projects have happened in last 4-6 years

- i. EU, particularly Belgium and Netherlands, are using advanced conductors to reconduct existing power lines with much larger capacity. NG has published little information on why this is not possible.
- ii. NG has been replacing overhead pylons with underground cables in UK AONBs, an admission of the flaws of large pylons.
- iii. Viking link from UK to Denmark, 760 km of HVDC cables so technology is proven.
- iv. 4,300-mile cable to Singapore from Australia approval from both Governments.
- v. North Sea link 720km power cable between Norway and UK becomes operational.

The first commercial subsea HVDC link celebrated its 70th anniversary in 2024 having been built in 1954 between the Swedish mainland and Gotland by Vattenfall. So, Sweden built a subsea HVDC 70 years ago and National Grid struggles to go around the North Sea coast and has quoted technology as a reason as well as cost? Has anyone spoken to Vattenfall for their opinions?

2. Cumulative effect of Great Waltham and TFP Land, including Lions (Lyons) Mineral Site

TFP asks the Planning Inspector to look at the cumulative effect of the issues at Great Waltham and Great Leighs as they are adjoining land parcels and landowners both proposing the same NG solution due to new factors since 2023. So far National Grid have separated them as two different areas with separate problems. When viewed together the argument for the NG Great Waltham Alternative Route (aka Western Route) becomes much more compelling.

- NG claim that there is no new factors since 2023 to relook at this alternative route despite requests from Chelmsford City Council, Micklem Family, Cllr Mike Steel, TFP and many others. The Lions Mineral site NG admits was not known in 2023 and clearly Great Waltham heritage and complexities are substantial and weren't all known in 2023 so new factors have arisen since 2023 so this alternative route should be relooked at.
 - NG claims Great Waltham Alternative Route (and others), in Document: 7.21 2024 - Design Development Report for the Project Final Issue A Para 5.4 .178-5.4.187 "...would increase effects, compared with the 2023 preferred draft alignment, to varying degrees on woodland, residential amenity, and heritage assets". This contradicts the information below.
 - 7.21 2024 - Design Development Report for the Project Final, Issue A, August 2025 and NG Document: 5.15 Design Development Report - Final Issue A - August 2025 A states Great Waltham Alternative Route:
 - would be 2.5-3.0 km longer, 8 or 9 pylons extra, hence increased costs.
TFP says this is cost mitigated by the route having no impact on Lions mineral site.
 - Reduces heritage impacts and avoids Langley's Park, Grade 1.
 - *Micklem says it reduces heritage overall by 60 properties approx. even more if Goodmans Lane heritage assets (see below) are added to Great Waltham heritage assets.*
 - Impacts the Wilderness Foundation HQ
 - *TFP says this is dramatically reduced since the purchase of Mann Wood in 2024, a new factor as unknown in 2023, which is approx. 90 acres bigger and located a mile away.*
- Avoids pinch points (*incl. Great Waltham Pinch point*) between settlements and clusters of properties
TFP agrees

- It reduces impact on residential amenity compared to 2023 preferred draft alignment due to less houses being impacted

TFP agrees

- Located within a less sensitive landscape

TFP agrees

TFP would argue these are all positives and NG's Alternative Great Waltham Route, is more Compliant with Holford Rules 1,2 & 7 with Shetl 2003 Clarifications. NG should once again investigate this alternative and its reasons for not choosing it now.

3. Lions (Lyons) Minerals Site Alternative Route

- a. TFP and NG have been discussing a Route B to reduce the impact on the Lions mineral Site.
- b. 8.11 Approach to Scenarios Revision B Clean Version May 2026 Table 2.6 states In "order to provide clarity for detailed design, affected land owners, and in light of the substantially reduced sterilization associated with scenario B, the applicant confirms the change to scenario B will be taken forward." TFP was unaware this decision had been made.
- c. TFP has been shown some ideas on Route B in a meeting, but no designs have been completed or left until an email this morning. This makes it hard for TFP to comment and a meeting request to discuss it next week.
- d. TFP was also unaware that Route B would require taller pylons. This has not been discussed or agreed.
- e. More collaborative work must be done on this Route design including: haul road, surveys, pylons height and locations. TFP has requested Route B pylons are tight against the woodland, not all is ancient woodland and a pylon at the Southern most point within the red corridor.
- f. On completion of agreed designs, NG can reduce the acquisition area, the temporary and permanent rights on TFP land, which are at present excessive as designed for two possible routes.

4. TFP Housing Site

NG states the Chatham Green site was not included in the emerging Chelmsford local Plan. TFP, remains of the opinion, that the site should be and is of interest to Chelmsford City Council (CCC), who are experiencing rapid growth in housing and other needs, especially large sites. It is very difficult to allocate a large housing area when there is uncertainty around a DCO proposal to build a very high voltage power line over the housing area as it affects desirability and thus certainty of delivery.

A re-routing of the N-T away from the area would dramatically increase the desirability again and moving to Route B also reduces the sterilization of housing if Route B is taken to the most Southern point at the bottom of the red corridor as requested by TFP.

TFP will continue to engage with CCC as NG plans progress, including if Route B is adopted as TFP believes the reasons given by CCC can all be dealt with:

- relatively isolated from the strategic highway network and new railway station. *TFP points out the new railway station Beaulieu Park is 3 miles away and the Chelmsford North East Bypass phase 2 has direct roundabout access to TFP land*
- Landscape capacity and sensitivity concerns. *TFP believes these should not be strong concerns.*
- There is limited wastewater capacity to accommodate this development. *TFP has land adjoining wastewater plant to facilitate this expansion.*
- Reliance on car and employment opportunities would be less accessible to the wider population. *TFP says that there is already a cycle route alongside and direct access to the new Chelmsford North East bypass. These apply to nearly all large new garden village style developments and are solvable.*

5. Environmental & Visual

1. TFP notes the lack of any visualisations of a sensitive area that NG hasn't done a visual assessment from the area where Goodmans Lane meets Paulk Hall Lane despite this being highlighted by both Chelmsford City Council (7.2 Response June 2024) and TFP of a cluster of listed assets and their closest distance to the corridor as estimated by NG with their assessment in 6.11.A2 Environmental Statement Appendix 11.2:
 - a. Goodmans farmhouse (1122135) 65m – low adverse impact
 - b. Goodmans Barns (1171336) 65m– low adverse impact
 - c. Barn at Hole Farm (1171364) – 110m– low adverse impact
 - d. Hole Farmhouse (1338437) – 115m– low adverse impact
 - e. Lowleys farmhouse (1305642) – 260m– low adverse impact
 - f. Ponds (6404)– 40m – medium adverse impact
 - g. Goodmans Lane (6602)– Protected Lane – low adverse impact
 - h. Paulk Hall Lane (6601) – Protected Lane – low adverse impact

TFP does not believe that the impact of the pylon line so close to these listed buildings will have a low adverse impact, and requests a site inspection of this area especially as NG states that as a low value asset the setting of the protected lane was not considered in 7.13 CCC response June 2024, 8.8.1 Applicant's Comments on Written Representations Final Issue A - March 2026. CCC in Protected Lane Study September 2009 state that Planning permission will be refused for development that would have an adverse environmental impact upon Protected Lanes.

In addition, both Goodmans Lane and Paulk Hall Lane are closed during construction with large impacts on TFP. NG state that temporary crossover bellmouth is proposed to be installed on each of these routes. There is a drop of about 9 feet between the banks and the lanes making this almost impossible for the haul road to cross using this methodology as it would either be in the sky or blocking the lane with its disastrous implications

The re-routing of the route to the Great Waltham Alternative route would avoid the significant engineering required over Goodmans Lane and the environmental impact in this area.

6. **Administration**

- a. The size and importance of the intrusion of the route have meant that TFP has to spend a large amount of time trawling documents and meeting DCO deadlines and this has an effect on the business and individuals.
- b. TFP has been repeatedly told by Agents and advisors that The Heads of Terms should not be signed in their current form because of the unreasonable terms presented.
- c. Plans shown in meetings have not been left for TFP to review and provide comment on.
- d. SOCG documents have been turned a number of times; however, NG's appointed agents, Fisher German, continue to adopt an unreasonable and overly pressurised approach by requesting that TFP respond to SOCG comments within unrealistic timeframes. For example, at Deadline 1, TFP was given just 24 hours to review documents which had been with NG for approximately eight weeks. TFP remains willing to engage constructively with NG to reach a suitable solution. However, given the significance and complexity of the impacts on TFP, should NG continue with its current approach to the SOCG, through no fault of TFP, we are sceptical as to whether the SOCG can be concluded by Deadline 7 as requested by PINS.