

## Deadline 5 submission, 10/6/26

Contents of this submission	PAGE
• <b>Alternatives</b>	
○ HVDC: under-egging the pudding	2
○ Cable Ploughing	3
○ Offshore coordination	3
○ Upgrading the existing grid, including reconductoring	3
▪ A rebuttal of the Applicant's comments by TS Conductor	4
• <b>Risk to farmers</b> – back to the drawing board in Scotland	6
• <b>Comments on ExA's 2<sup>nd</sup> Written Questions</b>	7
• Our comments on <b>8.4.10.1</b> Applicant's Comments on PEA Response to ExQ	10
• Comments on <b>8.5.8</b> Applicant's Response to ISH 2 Action Points	14

### *Appendices within this submission*

- A. Letter from Scottish Government to SSEN re Kintore to Tealing 400KV OHL 23
- B. Emails about construction work during nesting season, Bramford to Twinstead 25

### *Appendices sent separately*

- C. **Legal opinion** from Lord Charles Banner KC
- D. **Colne Valley Landscape Study** by the Landscape Partnership
  - Di. Photos to accompany Colne Valley Landscape Study
  - Dii. Whole Route Landscape Study submitted to Applicant in 2024
  - Diii. Appendices to accompany Whole Route Study 2024
- E. **Wakes Colne Parish Council** comments on the Colne Valley
- F. **Chappel Parish Council** comments on the Colne Valley
- G. **Good Design**, comments responding to the Applicant.
  - Gi. Letter to Offset to accompany comments on Good Design
- H. **Historic environment**, Virginia Brewer, ExQ 2 comments
- I. **Historic environment**, Virginia Brewer, Rebuttal to Applicant's comments

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Please find below, and as separately submitted appendices, the comments of Pylons East Anglia Ltd for Deadline 5.

We will consider whether a further floods/hydrology and White Clawed Crayfish submission is required upon sight of the Applicant's responses to our Deadline 4 submissions. We remain concerned about the lack of further Issue Specific Hearings to address Alternatives, giving the complexity of the options and the continued obfuscation by the Applicant.

## Alternatives

We are two months from the end of the Examination yet we are still lacking credible evidence about deliverable alternatives. We are still yet to see a full funding breakdown for the project itself, despite asking several times over four years. Throughout the Examination we have submitted our own evidence of the harms caused by the overhead lines and AC undergrounding. These harms could be avoided or reduced by employing alternative technologies.

Not only that, but we find continued obfuscation and misleading evidence, as set out below for the HVDC and TS Conductor options.

### **Over-egging the HVDC pudding**

It appears that the Applicant has over-scoped the HVDC underground solution both in terms of required capacity and in design terms (for this see Appendix G, sent separately).

When a DC alternative to 400kV AC OHL's is sought, there is no need for 6GW of capacity. 4GW with DC would deliver the same project benefits, because DC is predictable, whereas AC needs headroom. This can be seen in practice in Eastern Green Link 3 and 4, where instead of a 400kV OHL solution, two 2GW HVDC solutions will be deployed.

We quote directly from the Eastern Green Link 3 & 4 Strategic Optioneering Report 2024<sup>1</sup>:

“5.0.1 The largest capacity AC technology option that can be used on NGET's transmission system consists of two 3,465 MW transmission circuits that are supported on a single set of towers (6930 MW double circuit capacity). The largest HVDC capacity systems that can currently be accommodated on our transmission system are 2,000 MW HVDC cables.

5.0.2 Power flows on AC transmission system circuits cannot be controlled to the same extent as can be achieved using HVDC connections. This lower level of controllability can result in higher power flows particularly during transmission system fault conditions. Taking account of the potential for higher power flows that could be expected, therefore to provide the potential equivalent capacity, the AC option would need to consist of a high capacity (6,930MW) double circuit route to meet any high loading during fault conditions.

5.0.3 The required capacity HVDC links over the proposed distance have comparable capital costs, but much lower lifetime costs than the alternative onshore AC option in this case. It is also recognised that delivery of an onshore solution with a long route length, carries much higher delivery risk than the HVDC reinforcement proposals (EGL3 and EGL4) that are currently

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■ [REDACTED]

being progressed. The use of overhead lines is not considered to be feasible because they cannot be delivered by the required 2030 timescale.”

This over-stating of capacity requirement in the case of Norwich to Tilbury requires scrutiny because it leads to costs and harms for the HVDC alternative being over-stated.

### **Cable ploughing**

The Applicant does not acknowledge that an HVDC underground solution installed by cable plough instead of trenching would result in a far lower land take than the AC proposal in front of the Inspectors – with a swathe 40 metres wide instead of 80m for pylons and up to 200m for AC trenching. It would also, according to evidence submitted to the Welsh Government (already in front of the panel) be significantly quicker than open trenching and also quicker than constructing pylons.

### **Offshore coordination**

We have seen no attempts by the Applicant to coordinate infrastructure offshore, despite NESO finding, in 2020, that offshore coordination would reduce cost and infrastructure and reduce land take by up to 213 hectares. It would of course eliminate a great number of other harms and blights, too. The Applicant itself also set out the benefits of an offshore grid in the video that was deleted from its website when the public discovered it<sup>2</sup>.

### **Upgrading the existing grid, including reductoring**

We have still seen no evidence that the Applicant has appraised the cost and practicality of upgrading the existing 400kV transmission grid using TS Conductor-style conductors (and the associated costs of substation and equipment upgrades). This approach would completely protect farmland. Please note in the following section a rebuttal by Usama Ahmed, Senior Vice President, Technology of TS Conductor of the Applicant’s claims about the technology.

We disagree with the Applicant that the ‘Cardiff’ conductors are to be used for 132kV – unless Green Gen Cymru’s own website is incorrect. It states that 400kV will be transmitted on 27m high pylons

Our understanding is that the conductors being used for the works on the Pelham-Rayleigh upgrade (Triple Araucaria) do not bring any significant capacity increase on those currently used (Quad Zebra). This seems to be a missed opportunity to increase capacity significantly in this region, without having to build new infrastructure.

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■ [REDACTED]

Elsewhere in the UK, for example in the case of the SCRE and WRRE OHL reconductoring<sup>3</sup>, which is one of seven reconductoring projects submitted to Ofgem on 2/6/26<sup>4</sup>, we see that a significant capacity upgrade is the purpose, and that the option of a new 400 kV circuit DCO / programme "would not meet the 2028 need and has higher cost/impact".

*"Preferred option: Option D-1 – reconductoring with preferred option at 170°C, with full refurbishment of fittings and targeted steelwork interventions (and replacement of earthwire with OPGW where required). The preferred option meets the minimum 3,100 MVA winter post-fault requirement by 2028 using currently type-registered conductors."*

The Applicant admits that for this reconductoring, it does not select the highest rated conductor available for the existing tower type, which demonstrates that there are options available to increase capacity further. Without evidence to show that the existing network has been fully upgraded to maximum capacity, the environmental and socio-economic harms of new overhead lines cannot be justified.

## TS Conductor technology mis-characterised by the Applicant

In "EN0200027-002386 8.4.8 Applicant's responses to submissions", the applicant set out a series of problems with TS Conductor that are not correct.

Below is a response to the Applicant's statements by **Usama Ahmed, Senior Vice President, Technology, TS Conductor:**

28/5/26

"I wanted to share a few factual points about TS Conductor and our AECC technology that I hope will be useful context.

TS Conductor is a US-based advanced conductor manufacturer whose Aluminum Encapsulated Carbon Core technology delivers two to three times the capacity of traditional conductors with minimal sag, reduced line losses, and a design architecture that addresses the fragility and reliability issues associated with earlier generations of composite core conductors. The technology has thousands of miles in revenue service across the United States and internationally, with an established track record on both new-build and reconductoring projects.

Please do not hesitate to reach out if you have any questions.

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■ [REDACTED]  
■ [REDACTED]

***TS Conductor AECC Technology: Clarifying the Record***

1. AECC is a new-build technology as much as a reconductoring technology.

TS Conductor's Aluminum Encapsulated Carbon Core technology is not a reconductoring-only solution. While it delivers compelling economics in reconductoring applications, its commercial deployment record in the United States includes extensive use on competitive new-build transmission projects won on purely commercial terms in one of the world's largest and most cost-scrutinised transmission markets. The value driver in new-build is not just high capacity operation but the near-zero thermal expansion of the carbon core, which virtually eliminates conductor sag. On new lines, this property allows significantly greater span lengths, reducing the total number of structures required and enabling the use of shorter, lighter towers. The net effect is a substantially lower total project CapEx despite a modest conductor premium, a proposition proven across numerous new-build deployments. Characterising AECC as applicable only to constrained existing infrastructure misrepresents the technology's engineering basis and its commercial track record.

2. Longevity concerns conflate technology generation with company age

Pointing to the number of years a specific manufacturer has been commercially active is not a meaningful measure of technology longevity. The relevant question is whether the design contains latent failure modes that would manifest over time. AECC was purpose-engineered to eliminate precisely the failure modes that made first-generation bare composite core conductors, such as ACCC, unreliable in service. Those earlier designs are documented to be brittle, sensitive to installation handling, and prone to in-service degradation, to the point where some deployments rely on embedded optical fiber monitoring just to track core integrity and detect damage that is not externally visible. TS Conductor's AECC resolves these problems at the design level. The carbon core is fully encased in a continuous, seamless, thick conductive aluminum sleeve that provides robust mechanical protection, eliminates handling sensitivity, and removes the degradation pathways inherent in bare composite core designs. The result is a conductor whose architecture is fundamentally more robust than the first-generation technology it succeeds. This is supported by thousands of miles of deployed and operational lines across the United States and internationally, alongside rigorous independent third-party testing. Longevity concerns are appropriately directed at designs with known fragility, not at AECC.

3. The technical substance of the TED Talk

Characterising a technology presentation as merely a sales pitch does not constitute a technical

rebuttal. Characterising a technology presentation as merely a sales pitch does not constitute a technical rebuttal. The forum in which an argument is made and the commercial affiliation of the person making it are separate questions from whether the underlying technical claims are accurate. In this case, the core assertions are independently verifiable and in large part uncontested: hard aluminium limits capacity at elevated operating temperatures; a low-thermal-expansion composite core eliminates the sagging that constrains high-temperature conductors; new-build lines benefit from longer spans and fewer structures when conductor sag is no longer the governing design constraint; and reconductoring with AECC avoids the structural retrofits that drive the majority of project cost in conventional reconductoring programmes. The North Dakota case study cited is a matter of public record, a real 230 kV project with documented 40 percent total CapEx savings and delivery 12 months ahead of schedule. These are not marketing assertions. They are outcomes from a completed, commissioned transmission project. The credibility of a technical claim is determined by the accuracy of its content and the evidence supporting it, not by the commercial interest of the person presenting it.”

## Risk to farmers

Further to our previously raised concerns about risks to farmers, we would like to draw attention to an important letter sent by the Scottish ‘Reporter’ (equivalent of a Planning Inspector) to SSEN on 14 May 2026.

This letter required additional information for the purposes of the *“inquiry held under the Electricity Act 1989 about the assessment of effects on agricultural operations on the Kintore to Tealing 400KV OHL transmission line”*.

SSEN has been told by the Reporter that it must:

- assess every single span of the line
- identify clearance heights individually and cumulatively
- carry out a detailed risk assessment for agricultural workers
- consider the real-world use of modern farm machinery, rain guns, spraying systems, and any farming operations presenting foreseeable danger
- fully assess agricultural land use impacts, including loss of prime land, land sterilisation, and changes to farming practice
- identify consequential socio-economic effects
- assess any residual significant effects on human health, including electrocution risk.

We include the letter in Appendix A.

## Comments on ExA's 2<sup>nd</sup> Written Questions<sup>5</sup>

### BIO 2.1 Length of hedgerows affected

We ask why, under the mitigation hierarchy, the principle of avoid has not been applied. Harm to hedgerows could be avoided using HVDC undergrounding, cable ploughing and other technical alternatives to overhead lines.

### DCO 2.G2 Use of 'where practicable'

We have very serious concerns about the implications of 'where practicable' and contend that it holds no weight in law.

Firstly, we set out a practical example of the application of the phrase 'where practicable' that we are seeing this month, during the construction of the Bramford to Tilbury route. The DCO states: "*In accordance with good practice measure B02 in the CoCP (DCO Document Ref: 7.5.1(d)), vegetation with the potential to support breeding birds will be programmed to be removed outside of breeding bird season (March to August inclusive) **where practicable.***"

Yet three separate incidents were reported to Pylons East Anglia in the week commencing 18 May in which National Grid was seen felling, had felled or attempted to fell hedgerows and trees.

We have written to ask the Applicant a number of questions, of which one was how they explain why it is not practicable to carry out the works outside bird nesting season. A copy of our email is in Appendix B. Given the urgency of the situation (birds and their nests are at risk right now, assuming the works are continuing, and the Applicant is at risk of being in breach of the Wildlife & Countryside Act 1981), we are alarmed that the Applicant replied on 27 May stating that they are treating the query as an EIR request, which means that they will respond to it without urgency, within twenty working days.

IF the Applicant has somewhere justified its reasons for it not being practicable to carry out tree and hedge work outside the nesting season, we have yet to see any justification on the local authority planning portal or in any information provided to us by National Grid or the contractor (Balfour Beatty).

In a situation where vegetation must be cleared in nesting season, the DCO states, "*If any vegetation clearance is required during the breeding bird season, vegetation will be checked by an ecologist and/or ornithologist (as appropriate) for nesting birds prior to removal. Appropriate protection*

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<sup>5</sup> <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-003104-N2T%20ExQ2%2022%2005%2026%20FINAL.pdf>

*measures will be put in place should active nests be found. These will include exclusion zones around active nests until chicks fledge or nests become inactive as determined by monitoring by the ecologist and/or ornithologist (as appropriate)”*

In one of the three incidents, the landowner is aware that no dawn bird surveys had taken place, yet a team of contractors arrived to fell a hedgerow and up to four mature oak trees. It was only after he challenged them that they left and later that day he received a phone call from the contractor (Balfor Beatty) telling him that they would not return until after 15 September after all.

This example demonstrates 1. How ‘where practicable’ seems to have no useful meaning and, 2. How hard it is to stop the Applicant from potentially causing harm once the DCO is over.

Thus, the policy wording must be rock solid, with no wiggle room, because it will be virtually impossible to enforce once construction begins. This project is also setting the precedent for many other pylons projects that follow.

#### **DCO 2.S5**

Given the above an Ecology Working Group, to include community representatives/Parish Councillors is essential, along with a mechanism to be able to call for an immediate halt to works when harm to nature is seen during construction.

#### **DCO 2.S10 Schedules 3, Requirement 7 (Construction Hours)**

We are pleased that the local authorities are maintaining their concerns about *“the core working hours of 07:00–19:00 on weekdays and 07:00–17:00 on Saturdays, Sundays and Bank Holidays, together with additional start-up and close-down activities outside these hours.”*

Our belief is that these hours breach Article 8 of the Human Rights Act, due to the sustained noise, vibration, light, dust and general disturbance. This is particularly the case at weekends and on Bank Holidays, and will be felt particularly acutely in those villages or properties that are closest to the pylons construction, for example (but not limited to) Aldham, Ardleigh and the Walthams.

*“Article 8 Right to respect for private and family life*

- 1. Everyone has the right to respect for his private and family life, his home and his correspondence.*
- 2. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for*

*the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.”*

There can be no necessity for the Applicant to put communities along a 180km project in a position where they are nearly constantly impacted by construction. We look forward to the Applicant's modelled alternative scenarios.

### **LV 2.12 The applicant Residential Visual Amenity Assessment – 1 (RVAA)**

In answer to the Inspectors' questions (a) How may this affect the magnitude of change of visual amenity and the judgement regarding residential amenity?; b) Are there any locations where changes to existing vegetation would increase the magnitude of change to visual amenity?) we refer the panel to the section below that deals with the Colne Valley/Fordham/Aldham.

### **LV 2.14 The applicant Mitigation hierarchy**

We would like to ask the Applicant if they would agree that avoiding harms to the environment, communities, farmland & farming, tourism and house prices would be best dealt with as follows in a sequential list in which the 1. Is the best and 6. Is the worst?:

1. Upgrading the existing grid
2. Offshore coordination
3. HVDC undergrounding
4. Undergrounding using cable ploughing
5. Shorter pylons e.g 27m pylons for 400KV (lightweight conductors as per Green Gen Cymru)
6. 400kV AC Lattice pylons (50m or short and fat) / T pylons / undergrounding

While we agree that they should always have been given consideration as an alternative and consulted on, we are concerned about the focus on T Pylons in the examination over other better alternatives. T Pylons have been shown to be noisy and require a permanent haul road, and more of them are required than lattice pylons, with the result that the harm can be increased. In our view they do not constitute a solution.

### **LV 2.19 The applicant 3D Visualisation Tool**

We believe that the Inspectors would benefit from seeing the 3D tool in its entirety, or at the very least, images from the tool for the Colne Valley. It was a great frustration during the Statutory Consultation that one could only see these images for a few minutes IF one was able to attend the drop-in events. Yet the panel will be aware of our submission about consultation deficiencies which listed the issues with timings and locations of drop-in events.

## Our comments on Document: 8.4.10.1 Applicant's Comments on Pylons East Anglia Response to ExQ1<sup>6</sup>

### **BIO 1.12 Assessment of bird mortalities**

The National Policy Statements, Natural England and the Applicant all concur that there is a risk to birds from collisions with overhead lines. The Applicant concedes that diverters do not work at night or in low visibility. The Applicant proposes to manage the risk to birds with diverters in only two locations along the route (Ardleigh & the Waveney Valley).

The Applicant has not addressed the risks to birds moving inland from the coastal areas and waterbodies it has avoided. The Applicant has not addressed the extremely high numbers of waterfowl observed by residents along the route, with photos submitted to this examination.

The Applicant fails to address the risk to the birds in the other waterbodies along the route, for example, the Colne, Blackwater, Brain (among others).

Yet it is without question that a 180km long, 50m high barrier across East Anglia will cause bird collisions and mortalities on a significant scale.

The Applicant fails to follow the Mitigation Hierarchy – step one is to avoid harm, which HVDC undergrounding or offshoring would achieve. The Applicant fails to adhere to the precautionary principle. Instead, the Applicant presents a hope-for-the-best scenario.

The Applicant attempts to distinguish between high voltage transmission lines and distribution lines but without presenting evidence. When the Applicant refers to 'studies', they do not include the name or author of the studies, which means that we cannot verify the evidence. The evidence actually says this, in a paper for Science Direct, called "Bird collisions with power lines: State of the art and priority areas for research", led by J. Bernardino<sup>7</sup>:

*"This paper is focused on collision as the most widespread interaction of these infrastructures with birds in the sense that virtually any aerial wire can pose an obstacle to flying birds, and it is thus associated with both distribution and transmission power lines (e.g. Bevanger, 1994)."*

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<sup>6</sup> <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-002718-8.4.10.1%20Applicants%20Comments%20on%20Pylons%20East%20Anglia%20Response%20to%20ExQ1.pdf>

A paper for Energy & Nature called “Avian-Power Line Collision<sup>8</sup>” states, “Collision can occur with poorly sited overhead power line of any voltage level: distribution, transmission or indeed communications lines.”

As we set out at Deadline 4, the Applicant states that they adhere to NatureScot guidelines, but on route selection, this is not the case. NatureScot says that surveys and routes should consider: “Areas outside protected areas that are used by birds which are a qualifying interest of a connected protected area.” And, “Known roosting and feeding areas, known flight paths between these areas or any known flight paths used by migrating birds. For example, placing a power line between fields used by grazing geese and a roost loch could cause mortality of commuting birds colliding with the wires, or potentially create a barrier effect leading to reduced use of the site.”

J Bernardino’s paper continues:

*“Several studies suggest that power line collision mortality can have significant population-level impacts (Loss et al., 2012; Schaub et al., 2010; Schaub and Pradel, 2004), and red-listed and economically important species are commonly documented casualties (Bevanger, 1995a, Bevanger, 1998; Hobbs, 1987; Janss, 2000). In some cases, there is evidence that power line collision mortality can even lead to changes in migratory patterns and flyways (Palacín et al., 2017).”*

With a population level risk, and a new barrier across East Anglia, we cannot afford to get this wrong.

## **LUS 1.4**

### **Acid sulphate soils**

Comment by Dr David Dent, global acid sulphate soils expert: “The National Grid response is no response at all, except that a new player has been brought in: 'The soil scientist' who will be on hand to produce a watch list of issues for the contractors; identify acid sulphate soils and other issues when they arise and, presumably, intervene once the damage is done.

We should like to know whom this soil scientist might be and his, or her, qualifications and experience.

We remain at a loss to understand why the potential problems that we have identified have not been eliminated in advance by on-site investigations and re-routing.



National Grid claim that it is not possible to avoid strategically important agricultural soils or environmental issues with any route across Norfolk, Suffolk and Essex. We draw their attention to the fact that an offshore grid does precisely that.”

We note that we submitted comments at Deadline 4 on acid soils that ‘crossed in the post’ with this response, and that we await the Applicant’s response. The fact remains that the Applicant has not tested for Acid Sulphate Soils.

### **Best and most versatile land**

It is incorrect that, as the Applicant states, "*The routeing and siting selection process confirms that there are no other suitable sites of poorer agricultural quality that can accommodate the Project.*"

It is inconceivable that there was not a site for EACN that is not on/surrounded by Grade 1 land. It is also inconceivable that there was not a more direct route than the one chosen for Norwich to Tilbury, which has a detour from its north-south route to Ardleigh and back to rejoin the north-south route.

The Applicant has singularly failed to justify the route, EACN site and technology chosen, in the context of avoiding the loss of best and most versatile farmland. Alternatives, as set out below under Alternatives, would avoid the loss of a great deal of BMV land.

### **SET 1.2.**

#### **House prices**

The Applicant is ignoring the real evidence along the route, dismissing it as ‘anecdotal’, in favour of one study in Scotland, having not made the effort to carry out a study of its own on the impact on home-owners and home-buyers along the route. We do not feel that it is the position of a community group to carry out a study but, if it assists the panel, we will attempt to gather further and more detailed information than we have already submitted about the impact of the project on house prices.

The Applicant has not acknowledged the London School of Economics study "Are friends electric?" which finds prices depressed as much as 1.5km from the lines by 3.9%. Clearly the impact on house prices closer to the project will be significantly greater, rising to unsaleable in direct proximity.

The Applicant argues that market trends dominate in the Beauly-Denny study. Even if that were so, we know that sellers here are being told by agents upon valuation and listing that they must reflect the prices and that buyers even far outside the swathe are asking questions about where the pylons

are. Members of our committee have personal experience of attempting to sell and buy their houses in the blight of the N2T project. It is a very real issue.

**Green Book**

The Applicant and the panel already have Lord Charles Banner's legal opinion about the Treasury Green Book, as well as Richard Buxton's comments on the requirement to adhere to the Green Book in his submission for the Dedham Vale Society (in association with PEA Ltd) at Deadline 4. We would also remind the Applicant of our submission relating to an examination of a local plan in which a Planning Inspector did find that the Green Book was a valid planning concern. We also remind the Applicant that the Green Book natural capital appraisal toolkit (ENCA) is embedded in NPS EN-1, and is therefore directly relevant to the Norwich to Tilbury project.

## Comments on Document 8.5.8 Applicant's Response to Issue Specific Hearing 2 Action Points

### Colne Valley: Fordham & Aldham



We submit a professional Landscape Sensitivity Appraisal for the Colne Valley by The Landscape Partnership, as separate Appendix D. The Appraisal is accompanied by photos (Appendix Di) and by the Whole Route Sensitivity Appraisal submitted to the Applicant during the Statutory Consultation (Appendix Dii) and its accompanying Appendix (Diii). These latter two are simply in case the panel wishes to refer to them when reading the Colne Valley specific study.

In addition, we set out below our own local comments in response to the Applicant:

<b>The Applicant says..</b>	<b>Our response</b>
<i>In response to Rules 2 and 3, the route aims to follow the most direct route avoiding the use of too many angle towers...</i>	This is not the case. The route has a kink near Ford Street and another near Aldham Hall. It is not a straight or direct route.
<i>...whilst avoiding areas of high amenity value, such as the Fordstreet Conservation Area and the listed churches at Fordham and Aldham.</i>	In fact, the pylons are exceptionally close to both Ford Street (c250m and c400m for the closest pylons) and Aldham (two pylons are c100m from houses and c300m from the church, which is 30m high). Pylons run parallel behind the Ford Street Conservation area on elevated ground, with the effect of encircling Ford Street.  Visualisation photographed from the Applicant's 3D display at drop-in events shows view from garden in Hines Close, Aldham:



We were not allowed access to the system to view visualisations outside the drop-in events (online) which meant that many people have never seen these.

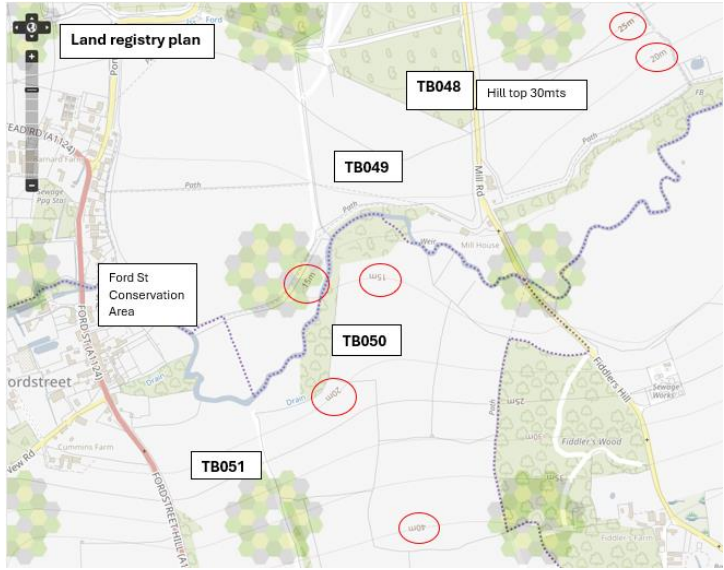
*In response to Rules 4 and 5, the route selected has had careful regard to the topography of the valley.*


We disagree, and set out why below but note also that not only is the applicant significantly harming the landscape by adding pylons, it is also harming the landscape by removing very large numbers of trees. This, in addition, reduces the screening/mitigation and makes the pylons even more obtrusive and visible in the Colne Valley particularly in the vicinity of Ford Street.

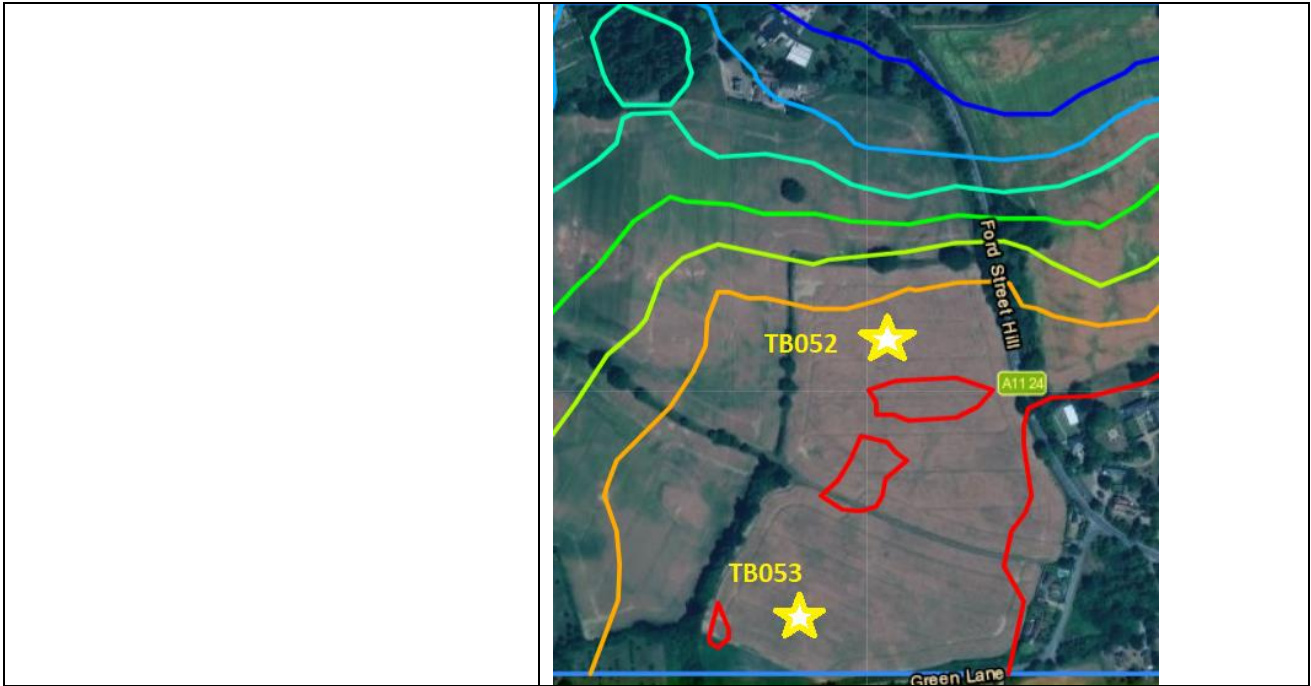


*(From Volume 2: Plans, Drawings and Sections Document: 2.16 Trees and Hedgerows to be Removed and or Managed Plans - Section D, Sheet 6)*

Pylons are being placed on hilltops exacerbating harm, particularly to the Ford Street Conservation area which located on low ground and is surrounded by hills. Pylon TB048

	<p>is on elevated ground in close proximity to the Ford Street Conservation Area</p> 
<p><i>It follows the slopes of a tributary valley to the north of the Colne Valley, passing to the east of Fordham.</i></p>	<p>The pylons do not follow the slopes. They cut across a beautiful valley of a tributary of the Colne, with very far-reaching views south-eastwards towards Colchester – Jumbo, the famous and iconic water tower, can be seen. The views down the tributary valley stretch across the Colne as it flows eastwards and will be broken by TB041, 042 and 043. Pylons 047 and 048 don't "follow slopes" – they would be placed near the top of slopes in an area with significant heritage assets and unspoilt countryside ruining the views towards Colchester in one direction and Aldham, with its listed church, in the other</p>
<p><i>In the vicinity of Fordham Place, there is an elevated plateau where longer views towards the surrounding area are experienced. The Project alignment aims to cross this plateau on an oblique angle to the south, utilising the lower areas of the tributary valley to the north-east and south-east of the plateau.</i></p>	<p>As the Applicant states, there is an elevated plateau with longer views across the surrounding area. Pylons TB041, 042 and 043 will obstruct this view. Pylons 44 to 48 are also on elevated ground compared with the surrounding areas which will cut across views that are currently unspoiled</p>
<p><i>The alignment continues to the east of Fordham and avoids the higher areas near the village of Fordham and the lower tributary valley areas where there are blocks of ancient woodland. The alignment passes through an area of community woodland south-east of Fordham, and across Mill Road at a point where the Project is able to avoid the Roman Villa excavation site and potential impacts on buried archaeology.</i></p>	<p>The alignment does not avoid the Roman Villa excavation site. As you will see from submission EN020027-002602, Pylon TB047 will be directly on top of possible archaeology that extends from the dig site, and towering over the dig site itself, destroying its setting and views from the site towards Colchester, the Roman capital, in the distance. Not only that, but as you will see from the submission, the pylon route as it passes by Fordham impacts numerous archaeological finds and sites. The Applicant has been told this repeatedly. In response to recent submissions the Applicant states that pylon TB047 has been moved north eastwards, yet the online map shows it has not moved. Pylons TB047 and TB048 are located on elevated positions</p>

<p><i>The alignment enters the lower valley area and crosses the River Colne directly on a perpendicular, utilising existing woodland strips to provide some immediate filtering of views near the Essex Way.</i></p>	<p>Much of the existing woodland in the vicinity will be removed for the project, thus it is questionable how much ‘filtering’ of the views there will be. The setting of the Ford Street Conservation area and the historic Essex Way will be changed irrevocably.</p> <p>As shown by the topography markings on the land registry plan, pylons do not enter the lower valley area. The lowest of the pylons (TB050) will still start 15mts above the Ford Street Conservation area.</p> <p>The established trees will not filter the cables given the relative disparity in size.</p>
<p><i>Routeing considerations have included avoiding a natural flood management and wetland scheme to improve flood storage and improve biodiversity to the east of the proposed RiverColne crossing.</i></p>	<p>The Applicant has not considered flooding adjacent to Ford Street where the works compound is proposed.</p> <p>Site of proposed TB050 is flooded every year</p> 
<p><i>The Project then passes obliquely up the sloping southern valley sides towards Gallows Green aiming to secure a background to the Project (as recommended by Holford Rule 4), before directly crossing the high point near Gallows Green, to seek to minimise the number of towers seen on the ridgeline</i></p>	<p>The removal of trees at the point where the alignment crosses the A1124 will have the effect of exacerbating the impact of the project by affording views to the north east across the Colne Valley and up the Gallows Green ridge to the south west.</p> <p>Pylons TB052 and TB053 are directly on the top of the ridge and will be highly visible and unscreened – see contour map below:</p>



### Western route

The Colne Valley western route is no more appropriate than the proposed route. It represents a very rough sketch drawing by a resident, with no research or evidence behind it. It is longer and therefore more expensive and increasing the harms, and brings a myriad of environmental, heritage and landscape problems of its own (for example, proximity to the Chappel Viaduct, a listed asset with far-reaching views from the Gainsborough Line, a large number of other heritage assets in close proximity, and landscape impacts in the wide and open Colne Valley at this location). It is incorrect to state, as the Applicant does, that "in purely landscape and visual terms, this route to the west may be considered preferable." In addition, stakeholders, including the Parish Councils of Wakes Colne and Chappel, have had no opportunity to submit feedback about this route. To this end, we include a letter from Wakes Colne Parish Council as Appendix E.

### Cultural significance of the Colne Valley

**Fordham, James Withers<sup>9</sup> (1812–1892)**, a labouring rural poet who spent most of his life in Fordham, living in what became known as "Poet's Cottage. His poems included "Fordham Church" and "Fordham Fire Brigade," meaning the village itself features directly in his verse.

### Chappel and Wakes Colne

<sup>9</sup> [The forgotten poet of Fordham | University of Cambridge](#)

The Gainsborough Line railway that serves Chappel & Wakes Colne station takes its name from **Thomas Gainsborough**, who was born in nearby Sudbury and whose early artistic vision was shaped by exactly this Colne/Stour valley landscape. The Gainsborough Line is a railway branch line linking Marks Tey in Essex (crossing the Roman River and the River Colne) with Sudbury in Suffolk.

The great viaduct at Chappel also attracted artists in its own right. The year after the viaduct's opening in 1849, local artist **Edward Robert Smythe** immortalised this magnificent monument to Victorian engineering in the style of Claude Lorrain, complete with peasants imported from the Roman Campagna. More recently, on its 175th anniversary, local artist **Władysław Mirecki** paid it an exhaustive tribute in a series of 64 watercolours framing its 32 arches from both sides.

#### **Wormingford:**

**██████████ CBE RA** (1893–1977), distinguished landscape painter and brother of Paul Nash, from 1922 made many visits to Essex and rented a summer cottage at Wormingford, near Colchester, and in 1945 he and his wife bought Bottengoms Farm where they lived until they died. He was one of the founders of Colchester Art Society and conducted yearly plant illustration courses at Flatford Mill. Nash painted the Colne Valley landscape repeatedly, exhibiting works such as *Harvest, Wormingford*, at the Royal Academy. His work is held in the Tate Gallery.

**Ronald Blythe CBE FRSL** (1922–2023), the writer best known for *Akenfield* (1969), his celebrated portrait of English village life, spent his later decades at Bottengoms Farm in Wormingford, which John and Christine Nash bequeathed to him. He wrote a long-running and much-praised weekly column in the *Church Times* called "Word from Wormingford." Blythe, described by *The Spectator* as "our greatest rural writer," observed and wrote about this corner of the Colne Valley — the lanes, seasons, and communities — for decades.

#### **Photos of the landscapes**

Drone footage of the Fordham/Aldham/Colne Valley area (Credit Mark McKeown):



*From Aldham, looking north towards Colne Valley/Fordham*



Looking across Aldham. The pylons would cross right to left & then past the village into the distance



Looking up towards Aldham from Fordham, Fiddlers Hill



Looking from Fiddlers Hill towards Fordham & the Roman dig



Looking westwards along the Colne Valley from Fiddlers Hill, Fordham



Aldham Church (30m high) seen from 1.5km away across the Colne Valley in Chappel. 50m high pylons will be on the skyline behind the church.



Credit: Marion Smith

Far-reaching views from the Chappel Viaduct towards Fordham & Aldham.



View across from public access woodland (west of Fordham, above Ponders Rd) to the field where the pylons will be.

The Colne Valley, as we demonstrate in our landscape report by the Landscape Partnership for this deadline, is an important and highly valued landscape and should not be despoiled by pylons at all, especially when there are alternatives such as HVDC undergrounding.

## Appendices

### Appendix A. Letter from the Recorder to SSEN

Planning and Environmental Appeals Division  
(DPEA)



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

Telephone: 0300 244 6668  
E-mail: DPEA-Kintore-Tealing400kVOHL@scot.gov.uk

G Hughes  
Scottish Hydro Electric Transmission Plc  
Sent by E-mail

Our ref: TRL-120-1  
Planning Authority ref:N/A

14 May 2026

#### SECTION 37 TRANSMISSION LINE: KINTORE TO TEALING 400KV OHL

#### Additional information required for the purposes of an inquiry held under the Electricity Act 1989

#### Assessment of effects on agricultural operations

The reporters have given careful consideration to the Matter 1 further written submissions from parties, and subsequent comments on one-another's responses, relating to the potential effects on agricultural operations.

The reporters have concluded that in order to accord with Regulation 19(2) of The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, supplementary information on the proposed development's effects (including cumulative effects) on agricultural operations is required, to enable the reporters and Scottish Ministers to reach reasoned conclusions on the significant effects of the development. This information is to be provided for the purposes of the inquiry.

Notwithstanding the terms of the scoping opinion issued on 19 December 2024 by the Scottish Government's Energy Consents Unit on behalf of the Scottish Ministers, the evidence now before the reporters relating to potential effects on human health (electrocution risk) and agricultural land use, both as a consequence of vertical clearance heights, indicates that it is necessary for this matter to be fully assessed as part of the Environmental Impact Assessment for the proposed development.

The applicant is required to provide an assessment of the entirety of the proposed overhead line, to identify if the proposed clearance heights of each span of the line would individually or cumulatively result in significant effects on human health and/or land use.

This assessment should address the following matters, as well as any other relevant matters identified through the course of the assessment, having regard to the evidence including further written submissions made by parties:

- The precise baseline position relating to statutory clearances and the factors to be taken into account in establishing necessary clearances on each OHL span, including the ESQCR, ENA TS 43-8, ENA 'Look Out, Look Up - bespoke guidance for agricultural sector' and any other relevant legislation or guidance.

- A detailed assessment of the foreseeable risk of danger to agricultural workers, having regard to the proposed clearance height of each conductor span (together with predicted variance in sag), the use of the over-sailed and immediately surrounding land, use of modern farm machinery including vehicles and necessary working clearances, use of rain guns / spray systems and any agricultural equipment or operations, which present a foreseeable risk of danger due to the proximity of the OHL.
- In each location (i.e. for each conductor span) where a foreseeable risk of danger exists, the precise mitigation measures proposed in each location should be identified to eliminate or otherwise minimise significant effects.
- Where a residual foreseeable risk of danger is identified across a span, or where mitigation would involve changes to the use of land beneath and/or near to the overhead line span, a detailed qualitative and quantitative assessment of the agricultural land use implications of the proposed development is required (for example, whether land, including prime agricultural land, would become sterilised or less productive, or where agricultural land use practices would need to be altered in order to be undertaken safely). Any consequential socio-economic effects should also be identified.
- Identification of the residual significant effects (if any) upon human health by virtue of electrocution risk to agricultural workers, and by virtue of any required changes to agricultural land use.

The reporters are mindful of the implications of this request for the inquiry timetable. The February 2025 Scottish Government [guidance](#) recognises that where additional environmental information is required, then the application may not be able to be decided within 52 weeks, and a new timescale for determination will require to be agreed. The application would still be treated as a priority over other section 37 applications and processed as quickly as possible once the additional information has been submitted, but this would be subject to the availability of reporters/ECU case officers.

The reporters intend to proceed with the confirmed hearing sessions in June 2026, but the provisional hearing on agricultural operations on 23 June will not take place. Once the requested additional information has been submitted, and once parties have been provided with an opportunity to comment on that information, the reporters will determine whether further procedure is needed and if so, what form that shall take (further written submissions, a hearing, or inquiry session). The timescale for any further procedure (if needed) and for the submission of their report to Scottish Ministers, shall also be provided by the reporters at that point.

In the meantime, it would be of assistance to the reporters if the applicant could provide an early indication of the anticipated timeframe needed to provide the required additional information based on its initial review of the request.

This request is made under Regulation 20(6), so the ordinary requirements for the publication of this additional information will not apply.

Yours sincerely,

**Kintore To Tealing 400 Kv Section 37 Team**


**KINTORE TO TEALING 400 KV SECTION 37 TEAM**

Case Officer

Planning And Environmental Appeals Division [Follow @DPEAScotland](#)

## Appendix B. Emails re bird nest disturbance, Bramford to Twinstead

Email FROM National Grid, 27/5/26:

ylons East Anglia},

Thank you for your email.

Protecting wildlife and complying with environmental legislation is fundamental to how we deliver our projects. All vegetation activities associated with the Bramford to Twinstead Reinforcement are carried out in line with our development consent order and licences issued by the relevant authorities.

Your email is being treated as an Environmental Information Regulations request and, as such, we will reply with our detailed response within the statutory period. However, noting the nature of your comments raised, we will try to provide an overview of this response as soon as we can.

Kind regards,

**Community Relations Team**

Bramford to Twinstead Reinforcement

nationalgrid

Email TO National Grid 24/5/26

**From:** PYLONS EAST ANGLIA>

**Sent:** 24 May 2026 09:39

  
**Subject:** [EXTERNAL] Bramford to Twinstead project: Hedgerow and tree felling in nesting season

Dear National Grid Bramford To Twinstead team,

Hedgerow felling, nesting season

I have received three sets of videos/photos from residents along the Bramford to Twinstead route which show that last week National Grid contractors were felling, have felled, or were attempting to fell, hedgerows and mature trees in the middle of nesting season.

I have searched through the DCO paperwork on Babergh's planning portal and am unable to find anything that allows this felling to happen during bird nesting season, certainly without explained justification and a paper trail of involvement at each site of ecologists..

You will be aware of your legal obligations under the Wildlife and Countryside Act 1981.

As you will also be aware, the DCO conditions for Bramford to Twinstead state the following:

*"Vegetation (such as hedgerows, woodlands, scrub, arable field margins and cereal crops) clearance with the potential to support breeding birds (both arboreal and ground-nesting) will be programmed to be removed outside of breeding bird season (March to August inclusive) where practicable. If any vegetation clearance is required during the breeding bird season then, in line with REAC EM B02, vegetation will be checked by an ECoW for nesting birds prior to removal. Appropriate protection measures will be put in place should active nests be found. These will include exclusion zones around active nests until chicks fledge or nests become inactive as determined by monitoring by the ecologist. In addition, the ECoW will deliver a toolbox talk detailing how to identify common breeding birds, suitable habitats within the authorised development that are present, and wild breeding bird protection (including penalties where an offence is committed) prior to clearance.*

*If any active breeding bird nests are observed, works will stop and an appropriately-sized buffer zone will be created around the nest (this will be dependent on the species observed) by the ECoW on site. Works will not re-commence until the nest is no longer active (i.e. the chicks have fledged).*

*Where any bird species listed under Schedule 1 of the Wildlife and Countryside Act 1981 may be impacted by vegetation clearance, additional surveys/checks will be undertaken by a suitably qualified ecologist to determine the mitigation requirements (e.g. an appropriate buffer around active nests or retiming works to avoid disturbance). Any active nests will be monitored, to ensure that mitigation measures are successful in avoiding disturbance and to determine when the chicks have fledged."*

With the above in mind, we seek your answers about the following questions:

### 1. PRACTICABILITY OF OUT-OF-SEASON CLEARANCE

Please explain, with supporting documents, why hedgerow and vegetation removal outside the breeding bird season was not practicable for the relevant section of works. We do not consider programme pressure, cost, convenience or contractor preference to be sufficient justification without further explanation. Please also confirm what alternatives were considered before in-season clearance was authorised, including:

- Scaffolding or bridging over hedges
- Partial retention of hedgerow sections
- Temporary exclusion zones
- Altered access arrangements
- Staged clearance
- Micro-routing
- Postponement until after the nesting season

### 2. ECOLOGICAL CHECKS AND SUPERVISION

Please provide written confirmation of the following in respect of all pre-clearance nesting bird checks undertaken for the relevant section:

- The timing and methodology of checks carried out prior to clearance
- Whether checks were completed before chainsaws or noisy machinery commenced
- How long checks took and what findings were recorded
- Whether any active or suspected active nests were identified
- Whether exclusion zones were imposed and, if so, where
- The name, employer and qualifications of the supervising ECoW/ecologist
- Whether the ecologist has authority to stop works
- Whether contractors have received the required toolbox talk on breeding bird identification, suitable habitats and legal protections (including penalties)

### 3. DOCUMENTS REQUESTED

Please provide copies of the following:

- Any Natural England licence, dispensation, approval or correspondence relied upon to justify in-season vegetation clearance
- The ecological method statement for the relevant section
- Pre-clearance nesting bird survey records
- Any site-specific assessment of trees, hedgerows, veteran trees, cavities or other habitat features
- Written sign-off authorising removal of particular trees or hedges
- The DCO power, notice or agreement relied upon for access

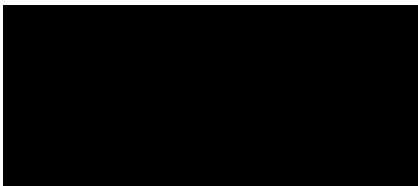
#### 4. ACTIVE NESTS

Please confirm that works will stop immediately if any active breeding bird nests are found, that an appropriately-sized buffer zone will be established by the ECoW, and that works will not recommence until the nest is confirmed as no longer active. Where any Schedule 1 species under the Wildlife and Countryside Act 1981 may be affected, please confirm what additional survey work is being undertaken and by whom.

We would be grateful for your response as a matter of urgency, given that works are ongoing. Please treat this letter as a formal request for information and justification under the terms of the CEMP and applicable wildlife law.

Thank you in advance

Yours faithfully,



Founder, Essex Suffolk Norfolk Pylons action group