

AENC-NG-CNS-REP-0363

# Norwich to Tilbury

**Volume 8: Examination Documents**

**Document: 8.4.1.3 Applicant's Comments on Change Application  
Relevant Representations**

**Final Issue A**

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**nationalgrid**

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# 1. Introduction

## 1.1 Overview

- 1.1.1 On 29 August 2025, National Grid Electricity Transmission plc (the Applicant) submitted an application to the Secretary of State for Energy Security and Net Zero for a Development Consent Order (DCO) to authorise the construction and operation (and maintenance) of the proposed upgrade to the electricity transmission system in East Anglia between Norwich and Tilbury (the Project).
- 1.1.2 The Application for the Project was accepted for Examination by the Planning Inspectorate on 26 September 2025 and has been allocated the reference number EN020027. The Examination of the Project commenced on 10 February 2026 and is expected to close on 10 August 2026.
- 1.1.3 Following submission of its application for development consent, the Applicant has continued engagement with stakeholders. As a result of this engagement, the Applicant notified the Examining Authority (ExA) on 12 December 2025 of its intentions to make two design changes (the Proposed Changes) to the application (see **[AS-049]** and **[AS-050]**). The Proposed Changes are as follows:
- Bulphan: Change to Third Party Access and Works (Change Request 1 (Bulphan)): an increase in the Order Limits for the Project to facilitate works required for the protection of the existing Thames to Buncefield Multifuel Pipeline, west of Langdon Hills Golf Club.
  - Little Bromley: Change to the EACN access (Change Request 2 (Little Bromley)): an amendment to the Order Limits for the Project in order to support a small modification to the route of the Applicant's construction access (for use when a third-party access is not available), and a further small modification to the route for the private permanent Abnormal Indivisible Load ("AIL") access route.
- 1.1.4 The Examining Authority issued a procedural decision in response to the notifications (see **[AS-049]** and **[AS-050]**) on 19 December 2025.
- 1.1.5 The Applicant consulted on the Proposed Changes between 19 January 2026 and 23 February 2026. The targeted consultations included prescribed consultees, relevant local authorities and parish councils, persons with an interest in land affected and nearby properties which are likely to be affected by the Proposed Changes.
- 1.1.6 On 27 March 2026, the Applicant submitted two concurrent applications (Proposed Change Application 1 in relation to Change Request 1 (Bulphan) and Proposed Change Application 2 in relation to Change Request 2 (Little Bromley)) to the ExA in order to make the Proposed Changes to the application. The ExA made a procedural decision to accept both change requests for Examination on 31 March 2026 **[PD-016]**.
- 1.1.7 Copies of the application documents relating to Proposed Change Application 1 (see **[CR1-001]** to **[CR1-017]** (inclusive)) and Proposed Change Application 2 (see **[CR2-001]** to **[CR2-017]** (inclusive)) can be viewed on the Planning Inspectorate's project webpage.

1.1.8 A relevant representation period opened between 9 April 2026 and 15 May 2026 in response to the accepted change requests. The representation period provided the opportunity for affected parties to submit a response relating only to the Applicant’s Proposed Changes set out in application documents **[CR1-001]** to **[CR1-017]** (inclusive) and **[CR2-001]** to **[CR2-017]** (inclusive).

## 1.2 Purpose of this document

1.2.1 This document presents the Applicant’s comment on relevant representations received from Interested Parties in response to Proposed Change Application 1 and Proposed Change Application 2 submitted on 27 March 2026.

1.2.2 A total of 30 representations were received during this period. The representations received were published on the Planning Inspectorate’s project webpage on 15 May 2026.

1.2.3 At the start of the relevant representations period and throughout that period, the Planning Inspectorate’s project webpage explained:

*“comments must relate only to the applicant’s proposed provision for the compulsory acquisition of additional land as set out in the applicant’s 27 March 2026 Change Requests application documents [CR1-001] to [CR1-017] (inclusive) and [CR2-001] to [CR2-017] (inclusive), which can be found in the Examination Library. Any comments that are not about this will not be seen by the ExA”.*

1.2.4 The Applicant has reviewed all representations received. Taking into consideration the statement from the Planning Inspectorate’s project webpage, the Applicant has structured this document as follows:

Relevant section in this document	Category	Number of representations received	Approach
2	Representations from already registered and newly registered Interested Parties responding directly to the Proposed Change Applications.	8	The Applicant has responded to these representations in Section 2 of this document.
3	Representations from newly registered Interested Parties not responding directly to the Proposed Change Applications.	11	The Applicant has identified 11 new Interested Parties who registered an interest in the Project during the relevant representation period on the Proposed Changes (9 April 2026 to 15 May 2026). These 11 Interested Parties have not submitted a representation into the Examination before under the name they have registered under. Whilst these representations are about the Project as a whole and do not relate directly to the Proposed Changes,

Relevant section in this document	Category	Number of representations received	Approach
4	Representations from already registered Interested Parties not responding directly to the Proposed Change Applications.	11	<p>the Applicant has responded to these representations in Section 3 of this document as it is the first time their comments have been raised.</p> <p>The Applicant has identified 11 Interested Parties who submitted a representation as part of the Applicant's initial relevant representation period (16 October 2025 to 27 November 2025) following acceptance of the DCO application and have submitted another response containing similar detail during the relevant representation period on the Proposed Changes (9 April 2026 to 15 May 2026). These representations are about the Project as a whole and do not relate directly to the Proposed Changes. The Applicant has therefore decided to not respond to these representations but instead directed the Interested Party to the Applicant's previous examination responses on these matters. See Section 4 of this document.</p>

## 2. The Applicant’s response to representations from Interested Parties responding directly on the Proposed Changes

### 2.1 Bruce Marshall [RR-3879]

Table 2.1 The Applicant’s comments on Bruce Marshall’s Relevant Representation [RR-3879]

Relevant Representation	The Applicant’s Response
<p>Our farm is going to be devastated by the proposed project if it gets permission. Why this should even be considered on some of the best agricultural land in the country beggars belief!</p>	<p>It is noted that the affected party has a category 3 interest in Change Application 2. The potential effects on agricultural land, including high-quality (BMV) land, have been carefully assessed and are reported in the Environmental Statement. The effects of the Project on agricultural land have been assessed within 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138], with appropriate measures proposed, including commitments AS03, AS04, and AS05 within 7.2 Outline Code of Construction Practice [REP5-139].</p>
<p>Common sense overruled by profit for the shareholders!</p>	<p>The routing of the Project has sought, so far as reasonably practicable, to avoid or minimise impacts on the best and most versatile agricultural land, while balancing a range of environmental, technical and engineering constraints. The need for the Project is set out in the relevant National Policy Statements, which establish that such infrastructure is required in the public interest.</p>
<p>We have protected our land to the best of our ability for 50years and now we have no say!</p>	<p>Where impacts on agricultural land cannot be avoided, the Applicant has committed to mitigation measures to reduce effects during construction and to restore land following temporary use. The Applicant is also engaging with affected landowners to understand holding-specific impacts and, where possible, to minimise disruption to farm operations. The compulsory acquisition process provides a statutory framework through which affected parties can be heard, and for compensation to be assessed in accordance with the Compensation Code.</p>

Relevant Representation	The Applicant's Response
	<p>The Applicant acknowledges the affected party's long-term stewardship of the land. The Development Consent Order (DCO) process does not remove the ability of affected parties to have their views considered; rather, it provides a structured statutory framework through which representations can be made and examined by the Examining Authority before any decision is taken.</p> <p>The Applicant is committed to ongoing engagement with affected landowners to understand and, where reasonably practicable, reduce impacts on individual holdings.</p> <p>The Applicant has had ongoing dialogue with the affected party (and/or their professional representative) throughout 2026, particularly regarding land rights and heads of terms. The affected party's agent also attended the recent land agent working group meetings held on 18 May and 4 June 2026. More details of ongoing dialogue with the affected party can be found in document <b>4.4 Land Rights Tracker [REP5-074]</b>.</p>

## 2.2 Essex County Council [RR-3882]

Table 2.2 The Applicant’s comments on Essex County Council’s Relevant Representation [RR-3882]

Relevant Representation	The Applicant’s Response
<p>With reference the Regulation 7 letter issued by National Grid Electricity Transmission PLC dated 8th April 2026, Essex County Council (ECC) has considered the proposed changes to the aforementioned project.</p>	<p>The Applicant has noted the response and confirms that measures would be in place to ensure surface water runoff is managed during construction and operation. The measures are described in <b>7.2 Outline Code of Construction Practice [REP5-139]</b> and <b>8.2 Drainage Strategy DCO [REP4-186]</b>. The Applicant will continue to engage proactively with ECC through the course of the Examination.</p>
<p>ECC acknowledges the proposed changes to the Order Limits associated with Change Request 2 (Little Bromley) as set out within the Regulation 7 Notice and accompanying plans, which comprise:</p> <ul style="list-style-type: none"> <li>i. a section of the Proposed Route nearest to Bentley Road is realigned to the south, for the permanent access relating to AILs during the operational phase of the Project;</li> <li>ii. to the north-west of the first modification, the Proposed Route for both construction and operational vehicles is changed to generally follow the alignment of the Proposed Route presented at statutory consultation between 10 April and 26 July 2024. This letter is focused on this Change Request only.</li> </ul>	
<p>ECC notes that the submitted Document 9.12 Addendum to Environment Statement – Change Request 2 (Little Bromley) [CR2-016] concludes the proposed design change would not introduce new or different likely significant</p>	

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**Relevant Representation****The Applicant's Response**

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environmental effects compared to those reported in the ES [APP-123 to APP-287, AS-026 and AS-068]. Moreover, ECC notes that proposed design change (either in isolation or in combination with Change Request 1: Bulphan) is not likely to affect the overall assessment and conclusions with respect to the likely significant effects presented within the ES [APP-123 to APP-287, AS-026 and AS-068].

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On the basis that measures to control surface water runoff are in place and any runoff is not pushed anywhere that would increase flood risk for the local residents or the highway, ECC would therefore raise no objection to the proposed Change Request.

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ECC welcomes the opportunity to submit this response. ECC will continue to engage proactively with the applicant and the Examining Authority as this application progress through Examination

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## 2.3 J G T Duffy [RR-3888]

Table 2.3 The Applicant's comments on J G T Duffy's Relevant Representation [RR-3888]

Relevant Representation	The Applicant's Response
Directly affected in Little Bromley	<p>The modifications as part of Change Request 2 at Little Bromley respond to feedback from, and ongoing detailed discussions with, affected landowners in order to secure an operational access arrangement that meets the Project need whilst also facilitating ongoing land management.</p> <p>The Applicant has reviewed whether the change would result in new or different likely significant environmental effects compared to those reported within the <b>Environmental Statement (ES) [APP-123 to APP 287, AS-026 and AS-068]</b>. Taking account of the nature of the additional works proposed and the implementation of mitigation measures already set out in the <b>Environmental Statement [APP-123 to APP-287, AS-026 and AS-068]</b>, it was concluded that there would be no new or different significant effects to those reported in the ES as a consequence of Change Request 2 (Little Bromley). Further details are provided in the <b>9.12 Proposed Change Application 2: Addendum to Environmental Statement - Change Request 2 (Little Bromley) [CR2-016]</b>.</p>

## 2.4 National Highways [RR-3895]

Table 2.4 The Applicant's comments on National Highways' Relevant Representation [RR-3895]

Relevant Representation	The Applicant's Response
National Highways have reviewed the amended information submitted as part of Change Request 1 (Bulphan) and Change Request 2 (Little Bromley), and we have no further comments to our previous comments issued as part of the Relevant Representation and subsequent submissions.	The Applicant has noted the response and will continue to engage with National Highways throughout the examination period.

## 2.5 Network Rail Infrastructure Limited [RR-3896]

Table 2.5 The Applicant's comments on Network Rail Infrastructure Limited's Relevant Representation [RR-3896]

Relevant Representation	The Applicant's Response
<p>This Firm is instructed by Network Rail Infrastructure Limited (NR) in relation to the application by National Grid Electricity Limited (Applicant) in connection with the DCO Scheme. The Applicant has submitted two change requests on 27 March 2026 as set out in documents [CR1-001] to [CR1-017] (inclusive) and [CR2-001] to [CR2-017] (inclusive) (Change Requests).</p>	<p>The Applicant notes the Network Rail's position and will continue to work collaboratively with Network Rail.</p>
<p>Based on our initial review of the Change Requests, these do not appear to involve any additional Network Rail interests, assets or affect the Representations already provided in respect of the Scheme. However, we have only recently received the shapefiles from the Promoter to enable Network Rail to carry out the necessary checks to confirm whether any impacts on, or risks to, Network Rail's assets may arise as a result of the Change Requests.</p>	
<p>Accordingly, Network Rail is continuing to review the Change Request documentation and proposals, together with the shapefiles, and will continue to work constructively with the Applicant to clarify any issues which arise out of this process. Accordingly, should any concerns arise out of our review of the shapefiles, Network Rail reserves the right to produce</p>	

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**Relevant Representation****The Applicant's Response**

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additional and further grounds of concern and its effects of this Change Request on Network Rail's assets are available. Should you have any further questions or require additional information, please do not hesitate to contact us.

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## 2.6 The Coal Authority [RR-3903]

Table 2.6 The Applicant's comments on the Coal Authority's Relevant Representation [RR-3903]

Relevant Representation	The Applicant's Response
<p>The Coal Authority have been consulted by National Grid in relation to the above. This consultation was received on the 8th April 2026 and the correspondence requests that we provide comments back to the Planning Inspectorate. Having reviewed the site plan for the proposal against the information we hold we can confirm that the site falls outside of the defined coalfield. On this basis the Planning team at the Coal Authority have no specific comments to make.</p>	<p>The Applicant has noted the response.</p>

## 2.7 Ward Hadaway LLP on behalf of Northumbrian Water Limited [RR-3905]

Table 2.7 The Applicant's comments on Ward Hadaway LLP on behalf of Northumbrian Water Limited's Relevant Representation [RR-3905]

Relevant Representation	The Applicant's Response
<p>We are instructed by our client Northumbrian Water Limited ("NWL") (who also operate under the trading name "Essex and Suffolk Water") in relation to the application for a Development Consent Order ("DCO") submitted by National Grid Electricity Transmission ("the Applicant") in respect of the Norwich to Tilbury Project (the "Project").</p>	<p>The Applicant has noted this response.</p> <p>Shapefiles have been provided to the respondent to facilitate the assessment of the proposed changes and any potential interactions with NWL's interests.</p>
<p>NWL are landowner, statutory undertaker and a Statutory Party for the purposes of The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015. For the avoidance of doubt, NWL has given notice that it wishes to be considered an Interested Party for the purposes of this matter pursuant to Section 89(2A)(b) of the Planning Act 2008.</p>	<p>Protective Provisions/Asset Protection Agreement negotiations are underway between both parties. Latest comments were returned by the Applicant to Northumbrian Water Limited's (NWL) lawyers on 30 March 2026. NWL have confirmed that they will respond to the APA and PPs once the same are agreed on the Sea Link Project. As these protective provisions are under negotiation, the Applicant anticipates including them in the draft Development Consent Order at Deadline 6.</p> <p>The Applicant seeks to progress towards a conclusion for both legal agreements and the interaction assessment.</p>
<p>At present, no protective provisions and/or asset protection agreements have been agreed between the Applicant and NWL, and as such NWL cannot confirm that it will not suffer serious detriment to the carrying on of its undertaking as a result of the compulsory acquisition of land or as a result of the acquisition of rights over land by the Applicant as provided for by the Change Requests.</p>	

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**Relevant Representation****The Applicant's Response**

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NWL is in the process of assessing the interaction between NWL's assets and the proposed changes to the scheme addressed by the Change Requests and must reserve its position pending the outcome of those assessments.

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As a result of the matters set out above, NWL must at this stage register its objection to the Change Requests pending the agreement of suitable protective provisions and/or asset protection agreements as well as the conclusion of the assessments set out above.

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## 2.8 Water Management Alliance on behalf of Norfolk Rivers Internal Drainage Board; Waveney, Lower Yare & Lothingland Internal Drainage Board; and East Suffolk Water Management Board's [RR-3906]

Table 2.8 The Applicant's comments on the Water Management Alliance on behalf of Norfolk Rivers Internal Drainage Board; Waveney, Lower Yare & Lothingland Internal Drainage Board; and East Suffolk Water Management Board's Relevant Representation [RR-3906]

Relevant Representation	The Applicant's Response
<p>We have been consulted on proposed changes to order limits for Change Request 1 (Bulphan) and Change Request 2 (Little Bromley).</p> <p>We have no comments to make on these proposed changes, since the affected areas are well beyond the Internal Drainage Boards' internal drainage districts.</p>	<p>The Applicant has noted the response.</p>

### 3. The Applicant’s response to representations from newly registered Interested Parties not responding directly on the Proposed Changes

#### 3.1 Daniel Dunne [RR-3880]

Table 3.1 The Applicant’s comments on Daniel Dunne’s Relevant Representation [RR-3880]

Relevant Representation	The Applicant’s Response
I don't want to see these being put up as much as the houses being put up in the village!	National Grid has a direct statutory duty to facilitate new connections and to operate and maintain a safe and secure National Electricity Transmission System. The Project is required to enable the delivery of existing connection agreements with two offshore wind farm projects and an interconnector project, through a connection to a new East Anglia Connection Node (EACN) substation. In addition, the Project would reinforce the local transmission network, which currently lacks sufficient capacity to reliably and securely accommodate the volume of electricity anticipated to connect in the future. Without this reinforcement, the network would be unable to support planned generation and interconnection in the region. The need for the Project has been tested and reaffirmed at each stage of its development. The UK Government is committed to delivering a clean electricity system by 2030, as set out in the Clean Power 2030 Action Plan. In November 2024, the National Energy System Operator (NESO) published its independent analysis on the pathways required to achieve this ambition. That analysis identifies the Project as critical to the delivery of a transmission network capable of supporting clean power pathways and meeting future energy demand. The technical need for the Project is set out in <b>7.17 Strategic Options Backcheck and Review [APP-355]</b> , while the policy justification for the Project is addressed in <b>5.6 Planning Statement [APP-085]</b> . Both documents were submitted in support of the application for development consent.

## 3.2 Great Glemham Parish Council’s Relevant Representation [RR-3885]

Table 3.2 The Applicant’s comments on Great Glemham Parish Council’s Relevant Representation [RR-3885]

Relevant Representation	The Applicant’s Response
<p>Great Glemham Parish Council has two principal concerns: the huge cumulative impact of the plethora of NSIPs running in East Anglia and their impact on local roads and amenities as well as their significant detrimental impact on the landscape</p>	<p>The Applicant notes that Great Glemham Parish is located between Framlingham and Saxmundham, which is over 20 km to the east of the Project and is therefore not located within the 3 km Landscape and Visual Impact Assessment (LVIA) Study Area. Effects on users of local roads within the LVIA Study Area are set out in <b>6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]</b>. Effects on landscape character within the Study Area are set out in <b>6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]</b>. Cumulative effects are set out in <b>6.17 Environmental Statement Chapter 17 Cumulative Effects [APP-281]</b> and <b>6.17.1 Environmental Statement Chapter 17 - Cumulative Effects – Response Update [REP4-163]</b> and the assessment considers the potential for cumulative effects resulting from the Project in addition to other development including other Nationally Significant Infrastructure Projects (NSIPs). The assessment also includes an assessment of whether the Project, with two or more other developments (i.e. a ‘cluster’ of developments), could also give rise to cumulative effects on a common receptor.</p>

### 3.3 Helen Knox [RR-3886]

Table 3.3 The Applicant’s comments on Helen Knox’s Relevant Representation [RR-3886]

Relevant Representation	The Applicant’s Response
<p>Please don’t do this, blighting miles and miles of once beautiful Essex countryside, ruining it for us and future generations. There are already more than enough ugly pylons around. Please bury these cables out at sea or under the ground. We had a pipeline buried through our farm when I was a child and it has to be a far safer long term option to do that. It may be more expensive to bury via an under water and/or under land pipeline system but with today’s materials, it will pay dividends down the line. Look further than today. It’s just wrong to blight Essex and Suffolk.</p>	<p>The development of the Project has to be completed within the scope of our duties (such as under the Electricity Act 1989 to be economic and efficient) and in line with planning policy in particular National Policy Statements (NPS) EN-1, EN-3 and EN-5.</p> <p>Through the course of developing the Project the Applicant has considered a wide range of strategic alternatives including predominantly offshore connections, onshore underground solutions and those with combinations of overhead line and underground cable. All options present combinations of technical and environmental challenges and consequences and at different levels of cost. A comprehensive justification for the selection of a predominantly onshore solution and reasons for not progressing an offshore solution is provided from paragraphs 3.3.16 in <b>8.8.2 Applicant’s Comments on Local Impact Reports [REP2-030]</b>. This sets out the substantially greater cost of an offshore solution to provide the same additional capability and connectivity as the proposed Project.</p> <p>It is also important to acknowledge that offshore solutions are not free from environmental effects nor technical challenges. The area around Tilbury is increasingly constrained by other developments, requires cable installation in a mobile marine environment with multiple other users and risks. Other alternative landing points such as Bradwell require routing through multiple environmentally protected areas and onward connection challenges to make the necessary connection to Tilbury substation.</p> <p>The Project progressed therefore as an onshore solution. NPS EN-5 makes it clear that Government’s strong starting presumption for new network developments is overhead lines but with guidance (see from paragraph 2.9.23) on occasions where this may change. The Applicant has developed the Project with careful consideration of the feedback received from stakeholders and communities as evidenced by the changes that have been made to the project in various locations including changes of technology (underground cables in place of overhead line, change to low height lattice pylons, changes of route alignment and change of siting some elements).</p>

Relevant Representation	The Applicant's Response
	<p>The effect that the Project would have on the landscape and on people's views and visual amenity is set out in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>.</p>
<p>After you've buried it, make use of existing roofs for solar panels, too.</p>	<p>The Project is generally being progressed as overhead line. A comprehensive justification for the selection of a predominantly onshore solution and reasons for not progressing an offshore solution is provided from paragraphs 3.3.16 in document reference <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>. This sets out the substantially greater cost of an offshore solution or an underground onshore solution to provide the same additional capability and connectivity as the proposed Project. The matter of solar panels on roofs is one for Government Policy not for the Applicant.</p>
<p>Please listen to us. Don't ruin our nation's future when there are other options. Have the courage to change all of these plans.</p>	<p>The Applicant notes the preference expressed but must develop its proposals in line with relevant policy which supports the Project as submitted.</p>

### 3.4 James Forder [RR-3889]

Table 3.4 The Applicant’s comments on James Forder’s Relevant Representation [RR-3889]

Relevant Representation	The Applicant’s Response
<p>I currently reside on (Redacted) in Bunwell and have significant concerns around the impact the project will have on wildlife in the local area and as permanently scarring the beautiful countryside we live in. The project will also have a significant effect on the value of my property which I am keen to explore with the developer.</p>	<p>The effects that the Project would have on wildlife (known as ecology and biodiversity) including the area around Bunwell has been assessed following industry good practice guidelines in <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>. <b>7.2 Outline Code of Construction Practice [REP5-139]</b> and <b>7.4 Outline Landscape and Ecological Management Plan [REP5-157]</b> identify mitigation measures required to safeguard wildlife during construction and operation (and maintenance) of the Project. The implementation of these mitigation measures would ensure that wildlife present within and adjacent to the Order Limits are protected from pollution and harm. Vegetation that is temporarily removed to facilitate the Project would be reinstated with new planting or be allowed to regenerate naturally dependent on the situation and what is deemed most appropriate as identified in <b>7.2 Outline Code of Construction Practice [REP5-139]</b> and <b>7.4 Outline Landscape and Ecological Management Plan [REP5-157]</b> and agreed with statutory and non-statutory consultees.</p> <p>The Applicant has sought to reduce, as far as practicable, potential impacts on landscape and visual receptors, through routing and siting, including consideration of the Holford Rules. The Applicant acknowledges the concerns raised regarding the potential effects of the Project near Bunwell. The effects that the Project would have on the landscape and on people’s views and visual amenity is set out in the landscape and visual impact assessment (LVIA) within <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP226]</b>. Bunwell is located within Visual Receptor Area (VRA) A5 Tacolneston as set out in paragraphs 13.4.49 to 13.4.59 of <b>6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]</b>, and within Landscape Character Area LCA E1: Ashwellthorpe Plateau Farmland (Section A) as set out from para 13.3.81 in <b>6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228]</b>. Whilst the rural landscape will remain in place beneath and around the proposed overhead line, it is nevertheless recognised by the Applicant that significant landscape and visual effects will occur during construction and operation</p>

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**Relevant Representation****The Applicant's Response**

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(maintenance). These would be largely within 1.5 km of the Project near Bunwell, as reported in the LVIA **[APP-226]**.

The Applicant notes the concern regarding potential effects on property value. Compensation for any reduction in property value arising from the compulsory acquisition or use of land is governed by the statutory compensation framework set out in the Land Compensation Act 1961 and related legislation. Where land or rights are acquired, or where a qualifying loss can be demonstrated, compensation is assessed on a case-by-case basis by reference to established statutory principles, including market value and any relevant injurious affection. The Applicant does not assess or agree property values outside of this statutory process. Affected parties are entitled to seek independent professional advice and engage with the Applicant's land team to discuss compensation matters in accordance with the statutory framework.

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### 3.5 Jean Hockley [RR-3890]

Table 3.5 The Applicant’s comments on Jean Hockley’s Relevant Representation [RR-3890]

Relevant Representation	The Applicant’s Response
<p>The presence of huge pylons and overhead cables will be a blight on much beautiful countryside and will cause chaos to many areas during the construction phase should it go ahead. When added to the continued excessive housing development in this area huge areas of farmland and wildlife habitats will be destroyed. Please choose underground or offshore options instead of damaging our countryside forever!</p>	<p>The development of the Project has to be completed within the scope of our duties (such as under the Electricity Act 1989 to be economic and efficient) and in line with planning policy in particular National Policy Statements (NPS) EN-1, EN-3 and EN-5.</p> <p>Through the course of developing the Project the Applicant has considered a wide range of strategic alternatives including predominantly offshore connections, onshore underground solutions and those with combinations of overhead line and underground cable. All options present combinations of technical and environmental challenges and consequences and at different levels of cost. A comprehensive justification for the selection of a predominantly onshore solution and reasons for not progressing an offshore solution is provided from paragraphs 3.3.16 <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>. This sets out the substantially greater cost of an offshore solution to provide the same additional capability and connectivity as the proposed Project.</p> <p>The effect that the Project would have on the landscape and on people’s views and visual amenity is set out in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>. The Applicant notes the concern with regard to the cumulative effect of the Project in addition to proposed housing developments. The cumulative assessment is set out in <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> and was updated in <b>6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]</b>.</p>

### 3.6 Julie Parmenter [RR-3892]

Table 3.6 The Applicant’s comments on Julie Parmenter’s Relevant Representation [RR-3892]

Relevant Representation	The Applicant’s Response
<p>I wanted to register my interest in this project as there are so many NSIPS going on in the Suffolk area whilst I am not clear if this will directly impact our area I wanted to see how this develops going forward to see how everything is coordinated going forward</p>	<p>The Examination of the Project commenced on 10 February 2026 and is expected to close on 10 August 2026. Should consent be granted, it is anticipated that construction of the Project would commence in 2027 and continue for four years through to 2031 (including demobilisation).</p> <p>The Applicant has prepared a standalone report detailing the Project’s interrelationship with other infrastructure projects, including relevant NSIPs and infrastructure projects in Suffolk (see <b>8.4.3 Report on Interrelationship with Other Infrastructure Projects [REP4-296]</b>). The report provides a summary of the approach taken by the Applicant to coordinate Project with the other projects and details of mitigation measures shared with other projects.</p>

### 3.7 Mauricio Jardim [RR-3894]

Table 3.7 The Applicant’s comments on Mauricio Jardim’s Relevant Representation [RR-3894]

Relevant Representation	The Applicant’s Response
<p>I object to this application on the grounds that it would introduce unnecessary and harmful overhead power lines into a countryside setting without sufficient justification that this is the least harmful option. The proposal would result in significant visual intrusion, harm the character of the rural landscape and may adversely affect birds and the local environment.</p>	<p>The Applicant has reviewed this response and does not consider that it relates directly to Change Request 1 (Bulphan) and/or Change Request 2 (Little Bromley). However, as the Interested Party has not submitted a representation into the Examination prior to the relevant representation period on the Proposed Changes (9 April 2025 to 15 May 2026), the Applicant notes this objection and has provided a response below.</p> <p>The effect that the Project would have on the landscape and on people’s views and visual amenity is set out in <b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>. The Applicant has identified significant effects on landscape and visual receptors up to a distance of approximately 1.5 km from the Project, and extending up to 2 km from some more elevated viewpoints. Paragraph 2.9.7 of NPS EN-5 (2024) recognises that new overhead lines can give rise to adverse landscape and visual impacts.</p> <p>The effects that the Project would have on protected and notable species, including protected bird species, and designated sites of nature conservation importance has been assessed following industry good practice guidelines in <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>. <b>7.2 Outline Code of Construction Practice [REP5-139]</b> and <b>7.4 Outline Landscape and Ecological Management Plan [REP5-157]</b> identify mitigation measures required to protect habitats and species during construction and operation (and maintenance) of the Project. The implementation of these mitigation measures would ensure that habitats and species are protected from pollution and harm.</p>
<p>It appears that cost has been given greater weight than landscape protection, environmental considerations, safety, and long-term practicality. I am not convinced that undergrounding or alternative routing has been properly assessed in enough detail. The application therefore fails, in my opinion, to</p>	<p>The Applicant has written extensively on its justification for decision making through the course of the Project’s development. The development of the Project by the Applicant has to be completed within the scope of our duties (such as under the Electricity Act 1989 to be economic and efficient) and in line with planning policy in particular National Policy Statements (NPS) EN-1, EN-3 and EN-5.</p> <p>Through the course of developing the Project, the Applicant has considered a wide range of strategic alternatives including predominantly offshore connections, onshore underground</p>

Relevant Representation	The Applicant's Response
<p>show that the chosen approach is appropriate or that the impacts have been adequately minimised.</p>	<p>solutions and those with combinations of overhead line and underground cable. All options present combinations of technical and environmental challenges and consequences and at different levels of cost. A comprehensive justification for the selection of a predominantly onshore solution and reasons for not progressing an offshore solution is provided from paragraphs 3.3.16 in <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>. This sets out the substantially greater cost of an offshore solution to provide the same additional capability and connectivity as the proposed Project.</p> <p>It is also important to acknowledge that offshore solutions are not free from environmental effects nor technical challenges. The area around Tilbury is increasingly constrained by other developments, requires cable installation in a mobile marine environment with multiple other users and risks. Other alternative landing points such as Bradwell require routeing through multiple environmentally protected areas and onward connection challenges to make the necessary connection to Tilbury substation.</p> <p>The Project progressed therefore as an onshore solution. NPS EN-5 makes it clear that Government's strong starting presumption for new network developments is overhead lines but with guidance (see from paragraph 2.9.23) on occasions where this may change. The Applicant has developed the Project with careful consideration of the feedback received from stakeholders and communities as evidenced by the changes that have been made to the project in various locations including changes of technology (underground cables in place of overhead line, change to low height lattice pylons, changes of route alignment and change of siting some elements).</p>

### 3.8 Nigel Graham Dyson [RR-3898]

Table 3.8 The Applicant’s comments on Nigel Graham Dyson’s Relevant Representation [RR-3898]

Relevant Representation	The Applicant’s Response
<p>We consider the damage to farmland in this area is unnecessary when an OFF SHORE route would have been cheaper to the country.</p>	<p>The development of the Project has to be completed within the scope of our duties (such as under the Electricity Act 1989 to be economic and efficient) and in line with planning policy in particular National Policy Statements (NPS) EN-1, EN-3 and EN-5.</p> <p>Through the course of developing the Project the Applicant has considered a wide range of strategic alternatives including predominantly offshore connections, onshore underground solutions and those with combinations of overhead line and underground cable. All options present combinations of technical and environmental challenges and consequences and at different levels of cost. A comprehensive justification for the selection of a predominantly onshore solution and reasons for not progressing an offshore solution is provided from paragraphs 3.3.16 in document reference <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>. This sets out the substantially greater cost of an offshore solution to provide the same additional capability and connectivity as the proposed Project.</p> <p>It is also important to acknowledge that offshore solutions are not free from environmental effects nor technical challenges. The area around Tilbury is increasingly constrained by other developments, requires cable installation in a mobile marine environment with multiple other users and risks. Other alternative landing points such as Bradwell require routeing through multiple environmentally protected areas and onward connection challenges to make the necessary connection to Tilbury substation.</p> <p>The Project progressed therefore as an onshore solution. NPS EN-5 makes it clear that Government’s strong starting presumption for new network developments is overhead lines but with guidance (see from paragraph 2.9.23) on occasions where this may change. The Applicant has developed the Project with careful consideration of the feedback received from stakeholders and communities as evidenced by the changes that have been made to the project in various locations including changes of technology (underground cables in place of overhead line, change to low height lattice pylons, changes of route alignment and change of siting some elements).</p>

Relevant Representation	The Applicant's Response
	<p>The effects of the Project on agricultural land have been assessed within <b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b>, with appropriate measures proposed, including commitments AS03, AS04, and AS05 within <b>7.2 Outline Code of Construction Practice [REP5-139]</b>.</p>

### 3.9 Palgrave Parish Council [RR-3900]

Table 3.9 The Applicant’s comments on Palgrave Parish Council’s Relevant Representation [RR-3900]

Relevant Representation	The Applicant’s Response
<p>Palgrave Parish Council object to the Proposals and provide herewith a Summary of our Key Objections – Palgrave Parish Council</p>	<p>The Applicant has reviewed Palgrave Parish Council’s response and does not consider that it relates directly to Change Request 1 (Bulphan) and/or Change Request 2 (Little Bromley). However, as Palgrave Parish Council has not submitted a representation into the Examination prior to the relevant representation period on the Proposed Changes (9 April 2026 to 15 May 2026), the Applicant notes the Council’s objection and has provided a response below.</p>
<p>1. Excessive and Unfair Impact on Palgrave The proposed 50-metre pylons would pass through some of the most visually sensitive and elevated land in the parish, making them visible for miles and from almost every part of the village. This impact is compounded by the cumulative effect of existing and proposed major infrastructure, including two approved solar farms. The routing of pylons directly between these solar farms is excessive, unnecessary, and deeply unfair.</p>	<p>The Applicant has set out the basis for its decision making in Section 4.6 of the <b>5.15 2025 Design Development Report [APP-122]</b> which considered other route alternatives. This design has been developed in a manner consistent with the guidance of the Holford and Horlock Rules and in line with policy established by NPS EN-1 and EN-5 and has considered the effects of the proposals taking into account the existing baseline and other relevant cumulative projects.</p> <p>The effect that the Project would have on people’s views and visual amenity around Palgrave is set out for Visual Receptor Area (VRA) B2 Palgrave in paragraphs 13.5.13 to 13.5.24 of <b>6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]</b>. Effects would be significant within approximately 1.5 km of the Project, reducing to not significant from the settlement due to vegetation along the western edge of the settlement. Part of an existing 132 kV overhead line would be removed from views south of Palgrave.</p> <p>Cumulative effects are set out in <b>6.17.1 Environmental Statement Chapter 17 - Cumulative Effects – Response Update [REP4-163]</b> and this considers the potential for cumulative effects resulting from the Project in addition to other proposed development including other Nationally Significant Infrastructure Projects (NSIPs). This includes an assessment of whether the Project, in combination with two or more other developments (a ‘cluster’ of developments), could give rise to cumulative effects on a common receptor.</p>

Relevant Representation	The Applicant's Response
<p>2. Viable and Less Harmful Alternatives Ignored</p> <p>Consultation has been inadequate and fails to properly present or assess alternatives. The ESO East Anglia Network Study demonstrates that onshore HVDC (Option 8) performs significantly better than overhead pylons (Option 3), particularly in terms of environmental impact, community sentiment, and overall constraint costs. Dismissing “community sentiment” as irrelevant is unacceptable. The Parish Council endorses the representations of the Essex, Suffolk and Norfolk Pylons Action Group.</p>	<p>The Applicant disagrees with this statement which ignores the extensive presentation of alternatives that have been considered over the course of the development of the Project. These have included consideration of strategic alternatives (including offshore and onshore underground cable), alternative route corridors (near Palgrave this has included routes to the east parallel to the existing 400kV overhead line and routes further west), the use of underground cable for the Waveney crossing and different transition points, and localised pylon route alignment.</p> <p>The Applicant disagrees with the characterisation of cost and environmental performance of alternatives by the Interested Party and has set out its position in respect of the strategic options and its decision making most recently in document <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030] sections 3.2/3.3</b> and in <b>APP-122 Design Development Report (sections 4.6 and 5.1 are relevant to Palgrave)</b>. The Project decision making has applied relevant guidance within the context of the relevant policies.</p>
<p>3. Severe Visual, Landscape and Heritage Harm</p> <p>The scheme would cause substantial harm to Palgrave's conservation area, listed buildings, and historic landscape. The setting of the Grade I listed St Peter's Church, Valley Farmhouse and numerous Grade II listed buildings would be significantly compromised, including key long distance views. The Waveney Valley's distinctive landscape character would be permanently altered.</p>	<p>The effect that the Project would have on landscape character within the Waveney Valley is summarised in Table 4.20 on pages 465 to 467 of <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>. There would be a significant effect on landscape character up to a distance of approximately 1.5 km from the Project.</p> <p><b>6.11 Environmental Statement Chapter 11- Historic Environment [AS-068]</b> provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets. The assessment concluded that the Project would not result in any substantial harm to designated heritage assets. ‘Valley Farm House’ (1032791) has been assessed in <b>6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]</b> as experiencing a minor adverse, not significant, effect during construction and a neutral effect during operation, due to the removal of the closest pylons of the existing PKF 132 kV overhead line. The new 400 kV overhead line would be approximately 900 m away at the closest point, which would not significantly alter the setting of the asset or cause adverse effects. Palgrave Conservation Area and the Church of St Peter (1032776) were considered in <b>6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]</b> and it was concluded that their settings do not extend to the Order Limits and therefore there would be no potential for significant effects.</p>

Relevant Representation	The Applicant's Response
<p>4. Environmental and Biodiversity Damage</p> <p>The route threatens sensitive habitats supporting a wide range of protected and notable species, including bats, dormice, great crested newts, breeding birds, reptiles and mammals. It would undermine ecological connectivity between nationally and internationally designated sites, including Wortham Ling SSSI, Roydon Fen LNR and the Redgrave &amp; Lopham Fen Ramsar site.</p>	<p>The effects that the Project would have on protected and notable species and designated sites of nature conservation importance has been assessed following industry good practice guidelines in <b>6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026]</b>, <b>7.2 Outline Code of Construction Practice [REP5-139]</b> and <b>7.4 Outline Landscape and Ecological Management Plan [REP5-157]</b> identify mitigation measures required to protect habitats and species during construction and operation (and maintenance) of the Project. The implementation of these mitigation measures would ensure that habitats and species are protected from pollution and harm. Vegetation that is temporarily removed to facilitate the Project would be reinstated with new planting or be allowed to regenerate naturally dependent on the situation and what is deemed most appropriate as identified in <b>7.2 Outline Code of Construction Practice [REP5-139]</b> and <b>7.4 Outline Landscape and Ecological Management Plan [REP5-157]</b>.</p> <p>This reinstatement planting and natural regeneration would ensure that connectivity is maintained across the landscape including habitat links between Wortham Ling SSSI and Roydon Fen LNR. There would be no impacts to Redgrave and Lopham Fen Ramsar site as a result of the Project and Natural England agreed at scoping stage that this site could be scoped out of the assessment. The Project team are currently working with the WaLOR project to ensure there would be no detrimental effects on the nature recovery project that aims to maintain and create new links between these valuable nature conservation sites.</p>
<p>5. Proximity to Homes and Community Wellbeing</p> <p>Several pylons would be sited dangerously close to residential properties, including one located approximately 50 yards from a dwelling. The impacts on residential amenity, mental health, property values and quality of life are unacceptable. The proximity of pylons and construction compounds the distress already caused by other developments.</p>	<p><b>6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]</b>, and specifically <b>6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [REP4-148 – REP4-156]</b> (RVAA), contains an assessment of the visual impacts of the Project on residential properties within 200 m of the Project centreline. The purpose of this assessment is to determine whether there are likely to be any breaches of the Residential Visual Amenity Threshold (RVAT), as described in Landscape Institute Guidance Note (LI TGN) 2/19 'Residential Visual Amenity Assessment (RVAA)'. While it is recognised that the Project is likely to cause a high magnitude of visual change for a number of residential properties, no breaches of the RVAT have been found in the Palgrave area.</p> <p>The Applicant has assessed the impact of the Project on mental health and wellbeing, with findings presented in <b>6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]</b>. No significant effects have been identified, although the importance of inclusive</p>

Relevant Representation	The Applicant's Response
	<p>and transparent engagement with residents and stakeholders is noted, in order to help manage stress and anxiety. The Applicant has committed to the preparation of a Communication Strategy as part of the approach to active community liaison should the Project receive development consent; this is listed as commitment GG36 in <b>7.2 Outline Code of Construction Practice [REP5-139]</b>.</p> <p>The cumulative assessment presented in <b>6.17.1 Environmental Statement Chapter 17 - Cumulative Effects – Response Update [REP4-163]</b> notes that there may be adverse effects on mental health and wellbeing experienced as a result of stress and uncertainty associated with construction activities or perceived effect on neighbourhood quality / sense of place, however no significant cumulative effects are anticipated.</p>
<p>6. Impact on Public Rights of Way and Education</p> <p>The proposals would severely affect valued public footpaths, including the Angles Way long-distance route and Millway Lane, a designated Quiet Lane heavily used by walkers, residents and schoolchildren accessing local “Forest School” facilities. Educational and recreational opportunities would be diminished.</p>	<p>As set out in <b>7.6 Outline PRow Management Plan [REP5-163]</b>, the overall strategy is to maintain access along PRow at all times throughout the construction period, either through managed access along the PRow on its existing alignment, or through provision of appropriate diversions. As such there would be no severance of the overall network as a result of the Project.</p> <p>The Angles Way is affected for a short section of its length where it runs along Roydon South Norfolk FP14, between The Doit and Grove Farm, near Roydon Fen. It will not be closed, but will require a temporary diversion around the perimeter of a working area near Grove Farm for two months. For the remainder of the period during which it is affected by the Project, it will remain open on its existing alignment, with access managed as necessary in accordance with <b>7.6 Outline PRow Management Plan [REP5-163]</b>.</p> <p>Millway Lane will not be closed and access for pedestrians and PRow users will remain unaffected. The proposal is for a temporary crossover point to be constructed enabling construction traffic to cross Millway Lane; construction vehicles will give way at the crossover point to users of Millway Lane. Millway Lane is not a designated Primary Access Route and there are no proposals for construction vehicles to use it.</p> <p>Local schools, such as Roydon Primary School and Palgrave Church of England Primary School, are located more than 500 m from the Order Limits. Access for the purposes of educational and recreational opportunities associated with either the Angles Way long-distance route or Millway Lane will not be affected.</p>

Relevant Representation	The Applicant's Response
<p>7. Breaches of the Holford Rules The proposed routing breaches several established Holford Rules, notably by:</p> <ul style="list-style-type: none"> <li>– Failing to avoid areas of high amenity and ecological value;</li> <li>– Harming the setting of conservation areas and listed buildings;</li> <li>– Placing pylons on high ground against open skylines;</li> <li>– Failing to use landscape features to reduce visual intrusion.</li> </ul>	<p>The feedback fails to give the full wording and context for the Holford rules which provide more nuance than the partial wording presented. For example, Rule 1 starts with “Avoid altogether, if possible, the major areas of highest amenity value...” which it defines as nationally designated landscapes and Rule 2 qualifies the avoidance of smaller areas of high amenity value with “provided this can be done without using too many angle pylons”.</p> <p>The Applicant addressed its application of the Holford Rules in paragraphs 3.6.7 and 3.6.8 of document <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>. Noting that the application of the Holford and Horlock Rules typically involves balancing alternative solutions which can present conflicting rule compliance. Throughout the routeing and siting, the application of the rules required a careful balance of the competing constraints and the opportunities to identify what, on balance of the relevant factors, is the preferred solution. The Applicant has written extensively on the alternatives that have been considered over the course of the development of the Project. These have included consideration of strategic alternatives (including offshore and onshore underground cable), alternative route corridors (near Palgrave this has included routes to the east parallel to the existing 400kV overhead line and routes further west), the use of underground cable for the Waveney crossing and different transition points, and localised pylon route alignment.</p> <p>The Applicant has set out its position in <b>APP-122 Design Development Report (sections 4.6 and 5.1 are relevant to Palgrave)</b>. The decision making has applied relevant guidance within the context of the relevant policies.</p>
<p>8. Traffic and Construction Impacts Construction traffic accessing the site via Lion Road and the A143 would pose serious safety risks, particularly at a known accident blackspot prone to flooding. There is insufficient detail on mitigation, traffic volume, routing and enforcement. These impacts would persist for years during construction.</p>	<p>The Applicant has carefully reviewed the concerns raised by Palgrave Parish Council regarding the proposed construction activities near Lion Road. Following a detailed assessment of the site context, recent highway improvements, historical and current collision data, and the findings of the August 2024 Stage 1 Road Safety Audit, we are satisfied that our proposed works can proceed safely.</p> <p>The highway improvements delivered by Suffolk County Council in 2022/23—including buffer zones, enhanced signage, one-way restrictions, and weight limits combined with the closure of St John's House —have improved road safety and reduced turning conflicts in the area.</p> <p>The collision data, while acknowledging a history of incidents, shows a predominance of slight severity collisions, with a notable reduction in serious incidents in recent years.</p>

## Relevant Representation

## The Applicant's Response

The Stage 1 Road Safety Audit identified manageable design considerations, such as visibility splays and the retention of existing safety treatments, which will be addressed in the detailed design phase to ensure safe access and egress.

During the audit, no concerns were raised regarding existing flooding of Lion Road and the A143, however the Applicant also notes that any highway flooding issues are the responsibility of the Local Highways Authority.

The Applicant has also assessed the significance of effects on pedestrian, cyclist and horse-rider severance and amenity in **6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271]** for the daily (07:00-19:00) worst-case peak construction period for PAR 11 – Lion Road. Details of this assessment are presented within **6.16.A4 Environmental Statement Appendix 16.4 - Traffic and Transport Construction Effects [APP-275]**. It was concluded that the increase in traffic as a result of the Project and other committed developments on PAR 11 – Lion Road would not result in any significant effects on severance and amenity as there is only a 9% increase in total traffic and there will be a notably low number of construction movements with only one HGV every five minutes.

All information regarding mitigation, traffic volumes, routing and enforcement has been set out within **7.3 Outline Construction Traffic Management Plan - (Clean) [REP5-149]** and **7.11 Transport Assessment (Final Issue A) [APP-333]**.

### 9. Inconsistent and Unjustifiable Route Changes

Route deviations to avoid impacts near Wortham and a little-used private airstrip contrast sharply with the lack of consideration given to Palgrave. The amended alignment transfers impacts onto Palgrave residents, farmland and heritage assets without justification or equitable treatment.

The Applicant has written extensively on the alternatives that have been considered over the course of the development of the Project. These have included consideration of strategic alternatives (including offshore and onshore underground cable), alternative route corridors (near Palgrave this has included routes to the east parallel to the existing 400 kV overhead line and routes further west), the use of underground cable for the Waveney crossing and different transition points, and localised pylon route alignment. In considering each circumstance the Applicant has considered the guidance in EN-1 and EN-5 and other relevant legislation and applied this in a balanced way. The Applicant disagrees that there has been a lack of consideration of Palgrave which is over 1km to the east of the route.

As set out in response to point 3 above Palgrave Conservation Area was considered in **6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209]** and it was concluded that the setting of the conservation area does not

Relevant Representation	The Applicant's Response
	<p>extend to the Order Limits. New infrastructure for the Project would be located approximately 1.3 km from Palgrave Conservation Area, at its closest point. Due to the distance, intervening landscape and areas of modern development around some edges of the conservation area it was concluded, following the design change, that there is no potential for harm to Palgrave Conservation Area or the listed buildings within it.</p>
<p>10. Agricultural and Local Economic Harm The route affects high-grade (3A and 3B) irrigated agricultural land, a working farmyard, and threatens farming viability. Poor siting of pylons and laydown areas would unnecessarily disrupt irrigation, farming operations and rural livelihoods</p>	<p>The siting of the pylons has been considered as part of the Project design and assessment process. The footprint of the pylon is minimal and is unlikely to materially affect farming operations or overall farm viability. In addition, the farm business will receive compensation for the use of land associated with the pylon footprint. The effects of the Project on agricultural land have been assessed within <b>6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]</b>, with appropriate measures proposed, including commitments AS03, AS04, and AS05 within <b>7.2 Outline Code of Construction Practice [REP5-139]</b>.</p> <p>With regards of rural livelihoods, the Applicant has sought to avoid impacts on rural businesses, including recreation and tourism businesses, as far as reasonably practicable throughout the design process. No significant adverse effects on recreation or tourism businesses have been identified within Palgrave Parish Council, as demonstrated in <b>6.15 Environmental Statement Chapter 15 - Socio-economics, Recreation and Tourism [APP-265]</b>.</p>
<p>11. Inadequate Consultation and Community Engagement Consultation events were poorly timed, inaccessible to working residents, limited in scope, and perceived as tokenistic. Many parishioners believe decisions were predetermined, undermining trust in the process.</p>	<p>The Applicant set out a consultation strategy for the change applications, which was shared with local authorities for comment. This strategy took an approach to consultation on the changes as is appropriate and required, including running public information events and the provision of materials. The consultation focused scope on the content of the change application – rather than the wider project - and made this clear within the materials produced. In terms of event timings, a number of factors have to balance including venue availability, accessibility and location, and recognise timings may not match everyone's availability. As a result, the Applicant provide materials in digital form and ran evening webinars. While recognising concerns that decisions are taken in advance, all feedback received where relevant to the change applications was considered and responded to within the consultation report submitted to the Planning Inspectorate as part of the change application materials.</p>

Relevant Representation	The Applicant's Response
<p>12. Required Mitigation if the Scheme Proceeds If the project is approved despite these objections, the Parish Council insists that:</p> <ul style="list-style-type: none"> <li>• Undergrounding continues through Palgrave until at least the A143;</li> <li>• Pylons RG92 and RG93, associated laydown sites and construction accesses are relocated away from homes, farmyards and sensitive land;</li> <li>• Robust traffic management and clear construction routing are enforced;</li> <li>• Full, transparent cost comparisons of undergrounding and alternative options are undertaken on a level playing field</li> </ul>	<p>The Applicant has either already provided a comprehensive justification for its proposals or has included a measure addressing the point raised within its submission. For clarity the positioning of infrastructure and decision making on design and mitigation requirements has considered these aspects. On the specific matters noted:</p> <ul style="list-style-type: none"> <li>• The extent of 132kV undergrounding has responded to the effects from the existing and proposed infrastructure. Increased extent is not justified by the increased effects.</li> <li>• RG92 and RG93 are already midway between properties and moves to benefit one will increase effects for another.</li> <li>• Robust traffic management forms part of the proposals</li> <li>• A robust and proportionate assessment has been completed which does not require all alternatives to be developed to DCO standard.</li> </ul>
<p>Conclusion The current N2T proposal represents an unjustified, harmful and disproportionate intrusion into the landscape, heritage, ecology and daily life of Palgrave. The Parish Council urges National Grid to reconsider the routing, properly assess less damaging alternatives, and, at a minimum, substantially expand undergrounding to protect the integrity of Palgrave and the Waveney Valley.</p>	<p>The Applicant understands the Parish Councils position but has developed its proposals through a robust and proportionate assessment with decision making firmly positioned by the Policy set out in NPS EN-1 and EN-5. This is set out in the <b>5.15 Design Development Report [APP-122]</b> in section 4.6. The Applicant is clear that other alternatives are not free from effects and typically involve the transfer of effects to a greater or lesser degree. The alternatives have been carefully considered in accordance with national and relevant policy.</p>

### 3.10 Simon Lascelles [RR-3901]

Table 3.10 The Applicant’s comments on Simon Lascelles’ Relevant Representation [RR-3901]

Relevant Representation	The Applicant’s Response
<p>This project should be using an undersea cable around the coast, rather than severely damage large swathes of UK land. This proposal is clearly going to cause widespread damage to the environment and your team understand this very well - they are choosing to ignore the myriad protesting voices against the proposal because the proposal in its current form is simply a cheaper alternative than running cable around the coast.</p>	<p>The development of the Project has to be completed within the scope of our duties (such as under the Electricity Act 1989 to be economic and efficient) and in line with planning policy in particular National Policy Statements (NPS) EN-1, EN-3 and EN-5.</p> <p>Through the course of developing the Project, the Applicant has considered a wide range of strategic alternatives including predominantly offshore connections, onshore underground solutions and those with combinations of overhead line and underground cable. All options present combinations of technical and environmental challenges and consequences and at different levels of cost. A comprehensive justification for the selection of a predominantly onshore solution and reasons for not progressing an offshore solution is provided from paragraphs 3.3.16 in document reference <b>8.8.2 Applicant's Comments on Local Impact Reports [REP2-030]</b>. This sets out the substantially greater cost of an offshore solution to provide the same additional capability and connectivity as the proposed Project.</p> <p>It is also important to acknowledge that offshore solutions are not free from environmental effects nor technical challenges. The area around Tilbury is increasingly constrained by other developments, requires cable installation in a mobile marine environment with multiple other users and risks. Other alternative landing points such as Bradwell require routeing through multiple environmentally protected areas and onward connection challenges to make the necessary connection to Tilbury substation.</p> <p>The Project progressed therefore as an onshore solution. NPS EN-5 makes it clear that Government’s strong starting presumption for new network developments is overhead lines but with guidance (see from paragraph 2.9.23) on occasions where this may change. The Applicant has developed the Project with careful consideration of the feedback received from stakeholders and communities as evidenced by the changes that have been made to the project in various locations including changes of technology (underground cables in place of overhead line, change to low height lattice pylons, changes of route alignment and change of siting some elements).</p>

### 3.11 Tania Farrow [RR-3902]

Table 3.11 The Applicant's comments on Tania Farrow's Relevant Representation [RR-3902]

Relevant Representation	The Applicant's Response
<p>The intention to run these lines via pylons rather than via underground cables will fundamentally change the character of the areas it will pass through. The insistence not to accept the views of local people and local councils, to run the cables underground, is creating un-necessary negativity around green energy, just at a crucial time. It is vitally important, that as a country we move towards more sustainable energy, but this needs to be done with the support of the population, not by creating un-necessary resistance to a project that could be adjusted to gain public support.</p>	<p>The Applicant has developed the Project with careful consideration of the feedback received from stakeholders and communities as evidenced by the changes that have been made to the project in various locations including changes of technology (underground cables in place of overhead line, change to low height lattice pylons, changes of route alignment and change of siting some elements). This all has to be completed within the scope of our duties (such as under the Electricity Act 1989 to be economic and efficient) and in line with planning policy in particular National Policy Statements (NPS) EN-1, EN-3 and EN-5. EN-5 makes it clear that Government's strong starting presumption for new network developments is overhead lines but with guidance (see from paragraph 2.9.23) on occasions where this may change.</p> <p>In accordance with EN-1 and EN-5 policy, the Applicant has applied the strong presumption of overhead lines in the correct places, and reversed that presumption in the circumstances of a designated National Landscape. The Project has included undergrounding in particular locations outside the National Landscape, having applied the EN-5 policies. Details are set out in <b>5.15 Design Development Report [APP-122]</b> and <b>5.6 Planning Statement [APP-085]</b>. The Project has therefore complied with the relevant EN-5 policies on undergrounding.</p>

## 4. The Applicant’s response to representations from already registered Interested Parties not responding directly on the Proposed Changes

### 4.1 Angela Pyke [RR-3877]

Table 4.1 The Applicant’s comments on Angela Pyke’s Relevant Representation [RR-3877]

Relevant Representation	The Applicant’s Response
<p>I feel that other options have not been explored and that the visual impact and terrible, disruption to our wildlife country lanes and peace will be devastated.</p>	<p>The Applicant would like to thank this Interested Party for submitting their representation and notes that a response to the Applicant’s initial relevant representation period (16 October 2025 to 27 November 2025) following acceptance of the DCO application was submitted (see [RR-0211]).</p> <p>As explained on the Planning Inspectorate’s project webpage on 9 April 2026 and throughout the representation period relevant representations must relate specifically to the changes proposed:</p> <p><i>“comments must relate only to the applicant’s proposed provision for the compulsory acquisition of additional land as set out in the applicant’s 27 March 2026 Change Requests application documents [CR1-001] to [CR1-017] (inclusive) and [CR2-001] to [CR2-017] (inclusive), which can be found in the Examination Library. Any comments that are not about this will not be seen by the ExA”.</i></p> <p>The Applicant has reviewed the relevant representation received and does not consider that this response relates to Change Request 1 (Bulphan) and/or Change Request 2 (Little Bromley). The Applicant has previously responded to representations relating to the matters raised in <b>8.4.1 Applicant’s Comments on Relevant Representations [REP2-023]</b> and <b>8.8.1 Applicant’s Comments on Written Representations [REP2-029]</b>.</p>

## 4.2 Ben Knighton [RR-3878]

Table 4.2 The Applicant’s comments on Ben Knighton’s Relevant Representation [RR-3878]

Relevant Representation	The Applicant’s Response
<p>The desecration of the landscape in so much of Essex and East Anglia</p>	<p>The Applicant would like to thank this Interested Party for submitting their representation and acknowledges that this Party is an affected landowner for the Project. However, this Party’s interest does not relate to the Applicant’s proposed provision for the compulsory acquisition of additional land as a result of the change requests. The Applicant notes that a response to the Applicant’s initial relevant representation period (16 October 2025 to 27 November 2025) following acceptance of the DCO was submitted (see [RR-0953]).</p> <p>As explained on the Planning Inspectorate’s project webpage on 9 April 2026 and throughout the representation period relevant representations must relate specifically to the changes proposed:</p> <p><i>“comments must relate only to the applicant’s proposed provision for the compulsory acquisition of additional land as set out in the applicant’s 27 March 2026 Change Requests application documents [CR1-001] to [CR1-017] (inclusive) and [CR2-001] to [CR2-017] (inclusive), which can be found in the Examination Library. Any comments that are not about this will not be seen by the ExA”.</i></p> <p>The Applicant has reviewed the relevant representation received and does not consider that this response relates to Change Request 1 (Bulphan) and/or Change Request 2 (Little Bromley). The Applicant has previously responded to representations relating to the matters raised in <b>8.4.1 Applicant’s Comments on Relevant Representations [REP2-023]</b>, <b>8.4.1.1 Addendum to Applicant’s Comments on Relevant Representations [REP2-025]</b>, <b>8.4.1.2 Addendum to Applicant’s Comments on Relevant Representations – Part 2 [AS-089]</b>, <b>8.8.1 Applicant’s Comments on Written Representations [REP2-029]</b> and <b>8.8.1.1 Addendum to Applicant’s Comments on Written Representations [REP3-073]</b>.</p> <p>The Applicant is committed to ongoing engagement with affected landowners to understand and, where reasonably practicable, reduce impacts on individuals’ holdings. The Applicant has had ongoing dialogue with the affected party (and/or their professional representative) throughout 2026, particularly regarding land rights and heads of terms. The affected party’s agent also attended the most recent land agent working group meeting held on 4 June 2026. Discussions are ongoing. More details of ongoing dialogue with the affected party can be found in document <b>4.4 Land Rights Tracker [REP5-074]</b>.</p>

## 4.3 Earl Stonham Parish Council [RR-3881]

Table 4.3 The Applicant’s comments on Earl Stonham Parish Council’s Relevant Representation [RR-3881]

Relevant Representation	The Applicant’s Response
<p>Objection to the Scheme. Earl Stonham Parish Council OBJECTS STRONGLY to the current National Grid proposals for overhead power lines on 50m high pylons cutting through the most open and beautiful parts of our parish. Suffolk is renowned for its big skies, yet these views would be lost forever as a line of pylons would stride across our parish – and as the landscape through which the pylons would cross is relatively level, they would be visible for many miles around. The whole route from Norwich to Tilbury cuts through 183km of stunning countryside and would have an immense impact on the landscape and those who work or live in it or use it for recreation/health reasons.</p>	<p>The Applicant would like to thank this Interested Party for submitting their representation and notes that a response to the Applicant’s initial relevant representation period (16 October 2025 to 27 November 2025) following acceptance of the DCO application was submitted (see [RR-0971]).</p> <p>As explained on the Planning Inspectorate’s project webpage on 9 April 2026 and throughout the representation period relevant representations must relate specifically to the changes proposed:</p> <p><i>“comments must relate only to the applicant’s proposed provision for the compulsory acquisition of additional land as set out in the applicant’s 27 March 2026 Change Requests application documents [CR1-001] to [CR1-017] (inclusive) and [CR2-001] to [CR2-017] (inclusive), which can be found in the Examination Library. Any comments that are not about this will not be seen by the ExA”.</i></p> <p>The Applicant has reviewed the relevant representation received and does not consider that this response relates to Change Request 1 (Bulphan) and/or Change Request 2 (Little Bromley). The Applicant has previously responded to the matters raised by Earl Stonham Parish Council at Section 2.15 in <b>8.4.1.2 Addendum to Applicant’s Comments on Relevant Representations – Part 2 [AS-089]</b>.</p>
<p>Many areas of course (e.g. Dedham Vale) are a major attraction for tourists and nature lovers and, within our own parish, there are several certificated locations for caravans as well as Shepherd Huts for hire.</p>	
<p>Whilst we recognise the need to transition to Green Energy, we do not believe that this should be at a cost to our landscape heritage environment or those who live, work and visit our parish. We already have a second major infrastructure project approved, a solar farm</p>	

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**Relevant Representation****The Applicant's Response**

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development (Willow Solar Farm) which is to be located on highly productive, drought-resistant agricultural land in the fields immediately adjacent to the proposed pylon route.

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We believe that consultation has been and remains inadequate and valid alternatives with less negative impacts have not been adequately presented and considered. The ESO Report suggests that the energy requirements within Norfolk, Suffolk and Essex are very low and this new power line is not required to meet current and future local needs.

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Rather the main purpose of the pylons is to provide additional capacity for London and the South, and we believe these needs can better be met through alternatives which have been presented and assessed in the ESO East Anglia Network Study. Option 8 - Onshore HVDC and Option 1 – Predominantly Offshore; both options have a superior environmental ranking to Option 3 (onshore pylons), rank equally in deliverability and operability, and have superior ranking in community sentiment. In fact, all but one of the 9 alternative options studied are superior to National Grid's Option 3.

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We also point out that National Grid are rolling out a new T-ylon design for the Hinkley Connection Project. These pylons are smaller (35m), sleeker with a single pole and T-shaped cross arms and hold the overhead power lines suspended from two diamond-shaped 'earrings'.

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**Relevant Representation****The Applicant's Response**

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Although more steel is used in these pylons, the base of a lattice pylon uses around three times the area and uses 1.5 times the amount of concrete, leaving less land available for farming. The operational life of a T- pylon is around the same as a traditional lattice pylon at about 70-80 years.

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Section 3 of the TEP report to National Grid (September 2017) in relation to the proposed use of T-pylons to carry the power from Hinkley Point makes abundantly clear that T-pylons are visually much more appropriate and acceptable in a relatively flat landscape where pylons are silhouetted against the sky rather than hills and/or trees; the N2T route is almost entirely in such an open, flat landscape, with sky (East Anglia's famed 'Big Skies') as the principal backdrop.

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Harm caused by the project Built Heritage Earl Stonham residents are passionate about safeguarding their precious heritage assets. The community views with dismay the harm likely to be caused by these unsightly pylons. The siting of the proposed pylons so close to Earl Stonham is bound to have a huge effect on the setting of these assets. There are 45 listed Grade 1 and Grade 2 buildings within Earl Stonham dating back as far as the 14th Century. The Grade 1 listed Church of St. Mary the Virgin is the oldest surviving building in Earl Stonham. The closest listed buildings to the proposed pylon route are Spall's (Sporles)

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**Relevant Representation****The Applicant's Response**

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Farmhouse (2), Yewtree Farmhouse (2), The Elms Farmhouse (2), Hicks Farmhouse (2), Roydon Hall (2\*), Upper Lonsdales Farmhouse (2), Fen House (2) and Fen Farmhouse (2).

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Grade 1 and 2 listed buildings were often built with no or limited foundations and may be impacted by construction activity, including pile driving, as well as the volume of construction traffic required to deliver materials to site.

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#### Archaeology

We are not aware that National Grid have or will be undertaking site surveys prior to commencing construction although is a normal requirement for building sites. Without such surveys there is clearly a significant risk that sites of local and national interest remain undiscovered or at risk of damage/destruction from construction. The Suffolk Heritage Explorer provides details of Suffolk's rich archaeological heritage. The followings finds, historic buildings and location, relatively close to the pylon route have been identified within Earl Stonham:

- The current route of the A1120 runs along the site of Wicks Green, dating back to Medieval times (1066 to 1539) and shown on a parish map of 1587 and Hodskinson's Map of 1783.
  - Early Medieval scatter, C13-C14 pottery scatter found in field adjacent to Perfect Perennials Nursey and north of Bell's Lane (A1120)
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**Relevant Representation****The Applicant's Response**

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- Cropmarks of possible Bronze Age Barrows east of Sporles Farm. Circular cropmarks were identified on aerial photography. These are of uniform size of c.24m and could potentially represent round barrows of possible Bronze Age date.
- Roman Features 43AD to 409 AD and Roman artefact scatter C1 & C2. Features including a ditch and a small pit and finds - pottery (mainly C1 and C2), Samian, amphora, a few tile fragments, coins (?Hadrian and ? an Antoninianus?) - identified after topsoil stripped for sewage pipe. Partial sectioning of the features done by contractor.
- Bay's Farm, Earl Stonham. 19th century farmstead and farmhouse. Regular courtyard multi-yard plan formed by working agricultural buildings. The farmhouse is set away from the yard. Total change to the farmstead layout. Located within a hamlet.

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**Environment, Habitat and Species**

Any loss of well-established trees, hedgerows and field margins during construction would impact on local wildlife, causing significant habitat loss. Even if replaced like for like it would take years to regrow to maturity, and the loss of habitat would be detrimental to all wildlife in the area.

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There would be loss of Spinney Wood, behind Bay's Farm. There are also Tree Preservation

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**Relevant Representation****The Applicant's Response**

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Orders on land belonging to Stowupland Hall between the A1120 (adjacent to the proposed pylon construction and set down site) and Creting Lane.

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A range of wildlife would be potentially impacted. There are several ponds known to have newts (including Great Crested Newts) living in them, and otters have been seen locally. There also badger setts in and around the area. The pylon route is on the flight path of migratory birds and there are established bat colonies in the area which will use the hedgerows as navigation markers to their feeding areas; any hedgerow removal will have an impact on the bats. Deer also roam across the local landscape.

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#### Landscape Heritage

The pylons would have a significant impact on our landscape, classified as 'Ancient Countryside' by the late Professor Oliver Rackham. We have already referred to the loss of Suffolk's famed Big Skies, with the destruction of views across open landscapes and the view across to the Gipping Valley would be lost forever. The pylons would be visible for many miles around.

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Highly productive farming land would be lost to productive use during construction of the pylons with an ongoing impact from pylon sites and ongoing maintenance.

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**Relevant Representation****The Applicant's Response**

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It is likely that construction would lead to ground compaction and therefore increase the risk of flooding in those areas.

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There are many footpaths and public rights of way crisscrossing land along the pylon route. It is inevitable that the construction phase would impact on these, perhaps necessitating closure for weeks or months at a time, resulting in reduced access to our open countryside. Many of these footpaths form part of circular routes, which if closed, would limit access as there may be no alternative route.

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This may also impact on physical and mental health through reduced access for walking and to the countryside.

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#### Proximity to Houses and Businesses

The Pylon Route crosses the A1120, near several houses and businesses. Property values would be adversely affected for those houses and businesses close to the pylon route and it is likely to impact more widely on property values across the Parish.

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Earl Stonham is a rural area with most housing centred in small hamlets. Most of the open countryside is given over to crop cultivation. The impact on farming would be high during the construction phase with a loss of land available for cultivation. While this may be lower once works are completed, inevitably the pylon sites and the need for ongoing access would still

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**Relevant Representation****The Applicant's Response**

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reduce the amount of land available for cultivation. Such ongoing, invidious losses are significant given that the UK is not self-sufficient in food production, importing about 40% of the food it requires from outside the UK. A local plant nursery would be significantly impacted as it lies only about 250m from the pylon route.

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There is likely to be some impact on tourism affecting those businesses operating Certificated Locations, shepherds huts or bed and breakfast/Air BnB accommodation.

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**Road Infrastructure**

Residents and businesses are seriously concerned about likely disruption either to their businesses or for residents who live alongside the A1120 and all the other local roads.

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The A1120 is the main route through the Parish running from the A140 to the A14. It classified as a Zone Distribution Lorry Route (roads or parts of roads within a zone serving as a route to a local access route). It is also a diversion route for the A140 and A14 if they are closed. The A1120 already suffers from high levels of excess speed through the 30mph section through Forward Green.

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It is likely that residents living alongside the A1120 would experience increased noise and disruption and higher volumes of traffic during the construction phase leading to higher levels of wear and tear to the surface of the road. The

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**Relevant Representation****The Applicant's Response**

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proposed staging area adjacent to the A1120 to its junction with Saxham Street would emerge on to a national speed limit of 60mph. It is inevitable that construction would require some restrictions to manage traffic on the A1120 and other roads within the parish. This may be in the form of road closures, speed restrictions (we hope) and diversions. Diversions would need to be monitored and enforced to avoid creating rat-runs on unsuitable (often single-track) local roads.

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Access by construction traffic to the northern end of the pylon route, west of Leylands Farm, would need to be from the A140, given the 7.5t weight limit along Saxham Street, and the total unsuitability of Blacksmith's Lane (a single-track road with virtually no passing places) as a short-cut for HGVs approaching on the A1120.

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In relation to the approved solar farm adjacent to the proposed power line, Suffolk Highways have stipulated that the site must not be accessed from Blacksmith's Lane by HGVs, because of the unsuitability of the road for large vehicles. The same rationale and precedent must apply to NG HGVs.

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Breaches of the Holford Rules We believe there are several breaches to the guidelines on overhead line routing, first formulated in 1959 by Sir William late Lord Holford, a part-time member of the CEGB. They are known as the

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**Relevant Representation****The Applicant's Response**

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Holford Rules and are still in use by National Grid.

Rule 4: Choose tree and hill backgrounds in preference to sky backgrounds wherever possible; and when the line has to cross a ridge, secure this opaque background as long as possible and cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees. The proposed route sites 50m pylons in the middle of open, flat countryside which would be clearly visible for miles around and ruin the views of our big skies.

Rule 5: Prefer moderately open valleys with woods where the apparent height of towers would be reduced, and views of the line would be broken by trees. This is clearly not the case as already detailed in 4 above.

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**Consultation**

We believe the consultation process has been flawed from the outset. National Grid ruled out several alternative options to the current proposal prior to the consultation process commencing, thus denying us the opportunity to help shape the consultation. It is not a true consultation if there is only one option to consider!

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Consultation meetings have all been timed to take place during the working day, denying working people the opportunity to express their views. We appreciate that there were some

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**Relevant Representation****The Applicant's Response**

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online webinars, but these were limited in scope. There has been 1 venue local to Earl Stonham – Needham Market which ran from 1pm to 6pm. The general feeling was that the webinar and in-person events were disorganised, that those representing NG were not open to discussion, not all questions were answered as a result and some of those that were answered were not necessarily accurate in their response. There has also been a conflict between responses given in webinars and at in-person event

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National Grid has failed to give residents any faith in the process resulting in a loss of trust and confidence in National Grid and its employees. Most have been left with the impression that residents views will be ignored and that we are being presented with a 'fait accompli', with a deal reached behind closed doors.

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In view of this we believe that National Grid's approach needs to be strategic and long-term given the number of projects under development by NG. Go back to the drawing board to bring all options into play.

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Cost calculations need to include whole costs not just construction costs - include impact on community and wider environmental costs. Offshore route and all other options should be brought back into play.

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**Relevant Representation****The Applicant's Response**

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In any event, any decision on N2T is premature pending the outcome of the OCSS (Offshore Coordination Support Scheme) investigating a coordinated design for offshore energy transmission, especially in the light of the Hiorns Smart Energy Network report's conclusion that the need for additional capacity is likely to be closer to 2035 than 2030. NG's insistence on a 2030 completion date does not chime with current thinking.

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**Mitigation**

Whilst having made very clear our disapproval of NG's consultation processes to date, including this one, and of the proposed scheme, if the N2T project gains approval, we seek the following mitigations: The current proposal envisages 50m tall lattice pylons on an 11m<sup>2</sup> concrete base which, in total, take up a large area of valuable productive land, and which (in NG's own research) are inappropriate in 'Big Skies', and relatively flat countryside. We request NG to use the new T-pylons which would cause less harm and have a lower impact on the environment.

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The removal of trees, hedgerows and field margins should be avoided other than as a last resort with any replacement on a 4 to 1 basis to speed up recovery.

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National Grid must make and adhere to strict traffic controls to reduce the impact of construction traffic on the A1120 and all the

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**Relevant Representation****The Applicant's Response**

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other local roads. These must include measures to control traffic entering the staging area alongside the A1120 and the Debenham Road (Saxham Street to the A140, the installation of Speed Indicator Devices in 30mph restricted areas and improved signage and road markings to deter speeding. We would also require National Grid to reinstate the A1120 and other affected roads following the completion of construction.

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There should be realistic compensation for losses for householders and businesses directly affected by the pylons

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## 4.4 Gavin Macfarlane [RR-3883]

Table 4.4 The Applicant's comments on Gavin Macfarlane's Relevant Representation [RR-3883]

Relevant Representation	The Applicant's Response
Objection on the basis of no true cost analysis and destruction of green farm land, as well as visible impact.	<p>The Applicant would like to thank this Interested Party for submitting their representation and notes that a response to the Applicant's initial relevant representation period (16 October 2025 to 27 November 2025) following acceptance of the DCO application was submitted (see [RR-1179]).</p> <p>As explained on the Planning Inspectorate's project webpage on 9 April 2026 and throughout the representation period relevant representations must relate specifically to the changes proposed:</p> <p><i>“comments must relate only to the applicant's proposed provision for the compulsory acquisition of additional land as set out in the applicant's 27 March 2026 Change Requests application documents [CR1-001] to [CR1-017] (inclusive) and [CR2-001] to [CR2-017] (inclusive), which can be found in the Examination Library. Any comments that are not about this will not be seen by the ExA”.</i></p> <p>The Applicant has reviewed the relevant representation received and does not consider that this response relates to Change Request 1 (Bulphan) and/or Change Request 2 (Little Bromley). The Applicant has previously responded to representations relating to the matters raised in <b>8.4.1 Applicant's Comments on Relevant Representations [REP2-023]</b> and <b>8.8.1 Applicant's Comments on Written Representations [REP2-029]</b>.</p>

## 4.5 Gislingham Parish Council [RR-3884]

Table 4.5 The Applicant’s comments on Gislingham Parish Council’s Relevant Representation [RR-3884]

Relevant Representation	The Applicant’s Response
<p>We have a high number of residents who are very concerned about the proposed project</p>	<p>The Applicant would like to thank this Interested Party for submitting their representation and notes that a response to the Applicant’s initial relevant representation period (16 October 2025 to 27 November 2025) following acceptance of the DCO application was submitted (see [RR-1271]).</p> <p>As explained on the Planning Inspectorate’s project webpage on 9 April 2026 and throughout the representation period relevant representations must relate specifically to the changes proposed:</p> <p><i>“comments must relate only to the applicant’s proposed provision for the compulsory acquisition of additional land as set out in the applicant’s 27 March 2026 Change Requests application documents [CR1-001] to [CR1-017] (inclusive) and [CR2-001] to [CR2-017] (inclusive), which can be found in the Examination Library. Any comments that are not about this will not be seen by the ExA”.</i></p> <p>The Applicant has reviewed the relevant representation received and does not consider that this response relates to Change Request 1 (Bulphan) and/or Change Request 2 (Little Bromley). The Applicant has previously responded to Gislingham Parish Council’s comments at Section 2.26 in <b>8.4.1.2 Addendum to Applicant’s Comments on Relevant Representations – Part 2 [AS-089]</b>.</p>

## 4.6 Holton St Mary Parish Council [RR-3887]

Table 4.6 The Applicant’s comments on Holton St Mary Parish Council’s Relevant Representation [RR-3887]

Relevant Representation	The Applicant’s Response
<p>NG to consult with the Council on a viable alternative to a proposed access road near the village. Discussion of Holton St Mary comments to the Examination Authority</p>	<p>The Applicant would like to thank this Interested Party for submitting their representation and notes that a response to the Applicant’s initial relevant representation period (16 October 2025 to 27 November 2025) following acceptance of the DCO application was submitted (see [RR-1437]).</p> <p>As explained on the Planning Inspectorate’s project webpage on 9 April 2026 and throughout the representation period relevant representations must relate specifically to the changes proposed:</p> <p><i>“comments must relate only to the applicant’s proposed provision for the compulsory acquisition of additional land as set out in the applicant’s 27 March 2026 Change Requests application documents [CR1-001] to [CR1-017] (inclusive) and [CR2-001] to [CR2-017] (inclusive), which can be found in the Examination Library. Any comments that are not about this will not be seen by the ExA”.</i></p> <p>The Applicant has reviewed the relevant representation received and does not consider that this response relates to Change Request 1 (Bulphan) and/or Change Request 2 (Little Bromley). The Applicant has previously responded to representations made by Holton St Mary Parish Council in Section 2 of <b>8.8.1 Applicant’s Comments on Written Representations [REP2-029]</b>, <b>8.4.1 Applicant’s Comments on Relevant Representations [REP2-023]</b> and <b>8.4.10 Applicant’s Comments on Responses to ExQ1 [REP4-299]</b>.</p>

## 4.7 John Frederick Strutt [RR-3891]

Table 4.7 The Applicant’s comments on John Frederick Strutt’s Relevant Representation [RR-3891]

Relevant Representation	The Applicant’s Response
I have engaged extensively with National Grid and Fisher German. A formal response was submitted on 29th July 2025 during the Landowner Consultation, following an extension due to initially incorrect mapping, as well as an additional submission on 26th February 2026. To date, I have not received any substantive response to this submission. The plans provided during consultation were often incorrect and of low resolution, hampering meaningful review and causing significant time and stress.	The Applicant would like to thank this Interested Party for submitting their representation and acknowledges that this Party is an affected landowner for the Project. However, this Party’s interest does not relate to the Applicant’s proposed provision for the compulsory acquisition of additional land as a result of the change requests. The Applicant notes that a response to the Applicant’s initial relevant representation period (16 October 2025 to 27 November 2025) following acceptance of the DCO was submitted (see [RR-3634]). As explained on the Planning Inspectorate’s project webpage on 9 April 2026 and throughout the representation period relevant representations must relate specifically to the changes proposed: <i>“comments must relate only to the applicant’s proposed provision for the compulsory acquisition of additional land as set out in the applicant’s 27 March 2026 Change Requests application documents [CR1-001] to [CR1-017] (inclusive) and [CR2-001] to [CR2-017] (inclusive), which can be found in the Examination Library. Any comments that are not about this will not be seen by the ExA”.</i>
Key Concerns and Harm Caused by the Project Heritage Significant visual impact on the Parish Church of St Mary the Virgin at Fairstead and Beauchamps House. To avoid detracting from the rural setting, we request the lines be buried.	The Applicant has reviewed the relevant representation received and does not consider that this response relates to Change Request 1 (Bulphan) and/or Change Request 2 (Little Bromley). The Applicant has previously responded to points raised by John Frederick Strutt’s comments in <b>8.4.1 Applicant’s Comments on Relevant Representations [REP2-023]</b> , <b>8.8.1 Applicant’s Comments on Written Representations [REP2-029]</b> , <b>Comments on any further information or submissions received by Deadline 2 [REP3-158]</b> and <b>8.4.9 Applicant’s Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]</b> .
Environment, Habitat, and Species The project passes near Galley Cable Wood and Troys Spring, which are important wildlife sites. Ground-nesting birds and other species will be affected.	The Applicant is committed to ongoing engagement with affected landowners to understand and, where reasonably practicable, reduce impacts on individuals’ holdings.
Landscape The project will compound landscape impacts caused by existing 400kV lines. The alignment	The Applicant has had ongoing dialogue with the affected party’s agent in 2026, particularly regarding land rights and heads of terms. The affected party’s agent also attended the most recent land agent working group meeting held on 4 June 2026. More details of ongoing

Relevant Representation	The Applicant's Response
<p>should, where possible, follow the route of existing lines to minimise new impacts.</p>	<p>dialogue with the affected party can be found in document <b>4.4 Land Rights Tracker [REP5-074]</b>.</p>
<p>Proximity to Business Agricultural workability of fields will be significantly reduced.</p>	
<p>Sporting rights (shooting operations) will also be severely affected.</p>	
<p>Breaches of Holford Rules We have concerns regarding design and routing in relation to Holford Rules, particularly regarding landscape sensitivity.</p>	
<p>Access Roads - Proposed access roads will have a severe impact on agricultural output and soil compaction.</p>	
<p>Connection Method - The connection should be either under the sea or underground to minimise surface impacts.</p>	
<p>Impact on Farming and Shooting Operations My tenant operates a commercial shoot, with two principal drives likely to be affected, potentially making them unviable. National Grid should coordinate with LRF to avoid shooting seasons during construction and minimise impacts on farming operations. Failure to do so will likely result in financial losses and potential compensation claims</p>	

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**Relevant Representation****The Applicant's Response**

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**Solar DCO Interaction**

Some of the land is subject to an approved DCO for Longfield Solar Farm. There are existing third-party rights. Early engagement between National Grid, Longfield Solar Farm, and the Estate is critical to minimise development conflicts.

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**Access Routes Plan 5111-1:**

Permanent access should follow the existing track along the field edge, not cut into the field.  
Plan 5111-2: Permanent access should follow the existing track along the field edge, not cut into the field.

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**Environmental and Landscape Considerations**

The development will result in landscape, environmental, and heritage impacts. This representation aims to ensure impacts are minimised and appropriately mitigated.

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**Final Note**

The cumulative burden of the consultation process, poor engagement, and the proposed impacts on the Estate's operations and environment is substantial. We request that these concerns be fully taken into account during the examination.

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## 4.8 Lord Rayleigh’s Farm Ltd [RR-3893]

Table 4.8 The Applicant’s comments on Lord Rayleigh’s Farm Ltd’s Relevant Representation [RR-3893]

Relevant Representation	The Applicant’s Response
<p>The purpose of this representation is to ensure the scheme is designed and implemented in a manner sympathetic to existing land uses, particularly the Estate’s ongoing commercial farming and shooting operations. We also highlight concerns with the engagement process and the potential environmental and operational impacts of the proposals.</p>	<p>The Applicant would like to thank this Interested Party for submitting their representation and acknowledges that this Party is an affected landowner for the Project. However, this Party’s interest does not relate to the Applicant’s proposed provision for the compulsory acquisition of additional land as a result of the change requests. The Applicant notes that a response to the Applicant’s initial relevant representation period (16 October 2025 to 27 November 2025) following acceptance of the DCO was submitted (see [RR-2185]).</p> <p>As explained on the Planning Inspectorate’s project webpage on 9 April 2026 and throughout the representation period relevant representations must relate specifically to the changes proposed:</p>
<p>Key Concerns</p> <ol style="list-style-type: none"> <li>1. Environmental Impacts - We are particularly concerned about the effect on local listed buildings and their settings. The mitigation measures proposed to date appear insufficient to fully address potential harm.</li> </ol>	<p><i>“comments must relate only to the applicant’s proposed provision for the compulsory acquisition of additional land as set out in the applicant’s 27 March 2026 Change Requests application documents [CR1-001] to [CR1-017] (inclusive) and [CR2-001] to [CR2-017] (inclusive), which can be found in the Examination Library. Any comments that are not about this will not be seen by the ExA”.</i></p>
<ol style="list-style-type: none"> <li>2. Compulsory Acquisition of Land - The extent of compulsory acquisition proposed is considered unnecessary and will have a significant adverse impact on the Estate’s commercial shoot operations</li> </ol>	<p>The Applicant has reviewed the relevant representation received and does not consider that this response relates to Change Request 1 (Bulphan) and/or Change Request 2 (Little Bromley). The Applicant has previously responded to representations made by this Interested Party in <b>8.4.1 Applicant’s Comments on Relevant Representations [REP2-023]</b>, Section 3 of <b>8.8.1 Applicant’s Comments on Written Representations [REP2-029]</b> and <b>8.4.9 Applicant’s Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]</b>.</p>
<ol style="list-style-type: none"> <li>3. Design Issues - There is no clear justification provided for the decision not to use underground cabling, which could reduce surface impacts. Additionally, safety concerns arise regarding machinery working near overhead cables.</li> </ol>	<p>The Applicant is committed to ongoing engagement with affected landowners to understand and, where reasonably practicable, reduce impacts on individuals’ holdings. The Applicant has had ongoing dialogue with the affected party (and/or their professional representative) in 2026, particularly regarding land rights and heads of terms. More details of ongoing</p>

Relevant Representation	The Applicant's Response
<p>4. Construction Impacts - The construction phase is expected to have a massive impact on the small rural roads around Fairstead, causing disruption, safety issues, and inconvenience to local residents and businesses.</p>	<p>dialogue with the affected party can be found in document <b>4.4 Land Rights Tracker [REP5-074]</b>.</p>
<p>5. Stakeholder Engagement - Engagement to date has been very poor. Notifications have been late, information insufficient or inaccurate, and responses to submitted concerns have not been forthcoming. This has caused unnecessary stress and uncertainty.</p>	
<p>6. Soil and Drainage - We are concerned about the long-term impacts on soil quality and drainage, particularly in haul road areas. There is insufficient detail about how soil compaction and drainage disruption will be mitigated or remediated.</p>	
<p>Engagement</p> <p>The Estate, together with its agent, has engaged extensively with National Grid and Fisher German. A formal response was submitted on 29th July 2025 during the Landowner Consultation, following an extension due to initially incorrect mapping, as well as an additional submission on 26th February 2026. To date, we have not received any substantive response to this submission. The plans provided during consultation were often incorrect and of low resolution, hampering</p>	

Relevant Representation	The Applicant's Response
<p>meaningful review and causing significant time and stress. The late notification of additional land required for an attenuation pond is a further example of inadequate consultation.</p>	
<p>Impact on the Estate</p>	
<p>1. Farming Operations - The proposals will cause significant disruption during construction, with potential long-term impacts on farming productivity, including risks of soil compaction and reduced yields.</p>	
<p>2. Soil and Drainage - Existing drainage systems must be maintained intact, as per drainage plans provided by the Estate. We seek assurance that land disturbed will be fully restored.</p>	
<p>3. Cable Depth - We request a minimum soil cover of 1.2 metres above cables to protect agricultural machinery and land use.</p>	
<p>4. Construction Management - Managing the farm during construction will require significant additional time and resources for access coordination, supervision, and ongoing operational adjustments.</p>	
<p>Compulsory Acquisition and Heads of Terms We are not yet in a position to negotiate Heads of Terms, pending further instruction from our agent. It is critical that the extent of land acquisition is fully justified and minimised. A</p>	

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**Relevant Representation****The Applicant's Response**

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properly designed scheme is essential to reduce impacts on the Estate.

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#### Environmental and Landscape Considerations

The development will result in disruption to landscape character and farming practices. This representation aims to ensure impacts are minimised and appropriately mitigated.

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#### Pylon Locations

- TB116 should be repositioned as far east as possible toward the hedged boundary to reduce farming impacts.
  - TB117 should be at least 40 metres from the southern field boundary to allow machinery access.
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#### Permanent Access Routes (Plan 1275)

We request permanent access routes follow existing field boundaries rather than cross through fields.

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#### Biodiversity Net Gain (BNG)

Woodland identified for BNG within Plan 1275 must be removed from Order Limits, as it is not available for sale and is integral to the Estate's commercial shooting operations.

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#### Solar DCO Interaction

The land is subject to an approved DCO for Longfield Solar Farm, with existing third-party rights. Early coordination between National

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**Relevant Representation****The Applicant's Response**

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Grid, the Solar Farm, and the Estate is essential to minimise conflict.

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**Shooting and Farming Operations**

Two key shooting drives will be affected, potentially making the shoot unviable during construction. We request National Grid works with the Estate to avoid shooting seasons and minimise farming disruption. Failure to do so may lead to financial losses and compensation claims.

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**Final Note**

The cumulative burden of the process so far — including poor engagement and unaddressed consultation points — has caused considerable stress and operational challenges. We request that these concerns be fully taken into account in the examination.

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## 4.9 Nicholas David Cheeseman [RR-3897]

Table 4.9 The Applicant’s comments on Nicholas David Cheeseman’s Relevant Representation [RR-3897]

Relevant Representation	The Applicant’s Response
<p>Relevant information in respect of the following Historic buildings and the Ecological Damage in respect of the area surrounding the Historic Buildings:</p> <ul style="list-style-type: none"> <li>• Entry Name: (Redacted) 15th c. Grade: II* Source: Historic England Source ID: 1050698 English Heritage Legacy ID: 226593</li> <li>• Entry Name: 2 storey Dower House, 16th c., called the Piggery by NG in the curtilage of (Redacted) Grade: II Source: Historic England Source ID: 1172231 English Heritage Legacy ID: 226594</li> <li>• Entry Name: Timber Framed 16th c. Norfolk Long Barn also in the curtilage of (Redacted) Grade: II Source: Historic England Source ID: 1373055 English Heritage Legacy ID: 226595</li> </ul>	<p>The Applicant would like to thank this Interested Party for submitting their representation and notes that a response to the Applicant’s initial relevant representation period (16 October 2025 to 27 November 2025) following acceptance of the DCO application was submitted (see [RR-2680]).</p> <p>As explained on the Planning Inspectorate’s project webpage on 9 April 2026 and throughout the representation period relevant representations must relate specifically to the changes proposed:</p> <p><i>“comments must relate only to the applicant’s proposed provision for the compulsory acquisition of additional land as set out in the applicant’s 27 March 2026 Change Requests application documents [CR1-001] to [CR1-017] (inclusive) and [CR2-001] to [CR2-017] (inclusive), which can be found in the Examination Library. Any comments that are not about this will not be seen by the ExA”.</i></p> <p>The Applicant has reviewed the relevant representation received and does not consider that this response relates to Change Request 1 (Bulphan) and/or Change Request 2 (Little Bromley). The Applicant has previously responded to representations made by Nicholas David Cheeseman in <b>8.4.1 Applicant’s Comments on Relevant Representations [REP2-023]</b>, <b>8.5.5 Applicant’s Response to the Oral Submissions Made at Open Floor Hearings [REP2-028]</b>, <b>8.4.9 Applicant’s Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298]</b> and <b>8.4.11 Applicant’s Comments on Further Information or Submissions Received by Deadline 4 [REP5-192]</b>.</p>
<p>(Redacted) is a significant Grade II* listed property. It has medieval origins, with later Tudor alterations. A significant amount of the original fabric survives and it clearly shows the evolution from a medieval hall house into a later gentrified residence. The building reflects centuries of continuous occupation and status. It is tied to the development of a rural estate and local social hierarchy. The Hall’s historical</p>	

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**Relevant Representation****The Applicant's Response**

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significance is further highlighted by its association with the Buttevelyan family, who owned the land in AD1103 and the Kemps, who owned a large manorial estate by the end of the 16th c. The Hall has been a central part of the Flordon village identity and continues to be a symbol of the area's heritage. It is intrinsically linked to the parish church, St Michael and All Angels, Flordon, also a grade 2\* building. Many occupants of (Redacted) are listed as either Patrons or clergymen of the church dating back to the 17th c. The associated building/barn\* are Grade II listed and are excellent representative examples of traditional Norfolk rural buildings. \*One building has been identified as the 'piggery' by the Applicant. It is in fact a substantial two storey Dower House (very clear if you actually look at the building), with a single storey cob barn attached, which has a date stamp of AD1134.

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Whilst the Applicant acknowledges that the Hall and Barns are located close to each other, they clearly just see them as three listed buildings. It should be noted that the site's importance is greater than the sum of its parts. It's not just three buildings; it's a complete historic environment. The Hall shows how people lived, the barns show how they worked, and the landscape ties it all together. Together they form a well-preserved, legible historic estate, which is why the whole site and landscape is such a significant heritage asset.

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**Relevant Representation****The Applicant's Response**

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The proposed pylons on our land (RG19-RG24) would pass from north to south west of the complex, the closet of which (RG21) would be some 200 m away but RG22 will have the most visual impact due to the topography and clear sight lines. The frontage of (Redacted) faces East, so the pylons will be seen from the rear but at that distance they will have a profound impact and dominate all views west over the land. No appropriate viewpoint image has been produced to make an appropriate assessment of this effect. However, a viewpoint image was taken on the Long Lane, to the south east of the Hall so its focus is taken from an oblique angle. It does however, give some indication of the likely appearance of the proposed development and how it will change an otherwise agricultural landscape. There are hedgerows and trees between the listed buildings and the fields containing the proposed development however, the pylons will be clearly visible from the immediate setting of the Hall, not least because the land height increases as you look towards the pylon locations. In terms of impact, it is noted that significant effects are identified up to a distance of approximately 1.5 km for landscape receptors and up to a distance of approximately 2 km for visual receptors. However, in terms of consequence, the residence at properties No 70-73 Flordon Rd and the property, 'High Hopes' will have pylons RG21 and RG22 frighteningly close to their homes with the attached cables being less the

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**Relevant Representation****The Applicant's Response**

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150m away. These are tenanted properties belonging to (Redacted) and let at affordable rates for local people. As they are in the wider curtilage of the Hall it is understood that they should be afforded similar protected status as the Hall and Barns. These are tenanted properties belonging to (Redacted) and let at affordable rates for local people. As they are in the wider curtilage of the Hall it is understood that they should be afforded similar protected status as the Hall and Barns. The proposed Order limits will be less than 10 feet from the front door of No 72 and No 73 Flordon Rd; access to the properties will be severely restricted. The effect on these residences and the property 'Gable End', will be utterly devastating. Access to the farm, the Hall and working buildings is also in question as a CA order appears to indicate that the driveway will not be available to us. This is the only route in and out of the farm and to the cottage at No 72 and 73 Flordon Rd. Closing this route is not acceptable under any circumstances.

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The Applicant's conclusions about harmful impact seem to be based on views from the listed buildings rather than views of them in their landscape setting. The Applicant considers that the assessment of permanent moderate adverse significance of effect (significant) (6.11.A2 Environmental Statement Appendix 11.2 – Historic Environment Assessment Tables [AS-070]) and Mid Less Than Substantial Harm (6.11.A7 Environmental Statement Appendix

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## Relevant Representation

## The Applicant's Response

11.7 - Assessment of Harm to Designated Heritage Assets [APP- 215]) to this listed building is appropriate and reflects the harm to the value of this asset. In this process they conclude the following:

- (Redacted): It is concluded that the asset would experience Mid Less Than Substantial Harm.
- Dower House or Piggery: It is concluded that the asset would experience Lower Less Than Substantial Harm.
- Long Barn: It is concluded that the asset would experience Lower Less Than Substantial Harm.

South Norfolk District Council's own experts disagree with these assessments and have written to the ExA to that effect. In relation to (Redacted)they state, "It is considered that (Redacted)I should be assessed as incurring a higher level of less than substantial harm than National Grid indicates". They conclude that the assessment should state; "(Redacted): Moderate adverse significance of effect (significant); High less than substantial harm.

The Applicant carried out a walk over exercise, taking photos of what they considered important within the landscape of the Order limits. One of the photos, noted as Plate 22, "shows a Farmyard with the Barn to (Redacted) and Piggery 60 yards south of (Redacted), looking east". They report the following:

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**Relevant Representation****The Applicant's Response**

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“Known Heritage Assets 2.1.23 The farmyard, where are located the Grade II barn to (Redacted)(1050698) and the Grade II Piggery 60 yards south of (Redacted)(1172231), is visible from the Order Limits (Plate 22). As for the (Redacted)(1050698), it is not visible due to a tree line to its west”.

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The photo appears to be an attempt to hoodwink the planning process by reducing the impact that pylons will have on this historical site. This action appears common place throughout the planning application. What the photographer failed, or possibly intended not to notice was that if they had taken the photo a few yards to their right, you would clearly see (Redacted) and the two listed barns in the picture. So, the obverse photo would clearly show just how significant and dominating the pylon at that location will be from the Hall and barns.

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I add the following paragraph as it demonstrates the significant way the Applicant has chosen to twist the way a setting is described and the ignorance that has been used to describe a given settings. Plate 28: A top-soil pile along Wymondham Road, looking north-east.

2.1.30 2.1.31 “A top-soil pile was witnessed during the walkover survey. The pile looked to be the soil from a hole which had been intentionally dug in the area next to the field entrance along Wymondham Road (Plate 28). The area is principally agricultural in use and is

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**Relevant Representation****The Applicant's Response**

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subject to modern farming practices including large drainage ditches”.

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What this actually shows is a pile of spoil left after the sugar beet have been harvested. The beet is stacked on the edge of the field next to the road, before being loaded for onward transportation and processing. This practice has been carried out for generations and is how we get most of the white sugar used in the UK. The hole they note is extremely significant. It is understood that this is one of the sites of a clay pit which was dug out to provide the clay to form the handmade bricks for (Redacted).

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(Redacted) and the area around the Hall and farm create a setting that has inspired many artists. The world renowned artist, George Edward Mackley MBE (born 1900 in Huntingdon, died 1983 in Tonbridge, Kent) was an English wood engraving artist. He created many pictures in and around (Redacted). One of his pictures, widely considered to be Mackley's finest wood engraving, was made at the Hall and entitled, “Threshing at (Redacted). This subject was chosen as the front cover illustration for the retrospective show on George Maclkey's wood engravings staged by Blond Fine Art in London in 1995. It not only depicts threshing but also the rural setting around the Hall.

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The natural environment around (Redacted) is typical of rural south Norfolk but with some

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**Relevant Representation****The Applicant's Response**

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remarkable ecological features because of its position in the River Tas valley. The surrounding land is mostly arable farmland and pasture. Fields are divided by mature thick hedgerows and tree lines, which are important wildlife corridors. Small copse and spinney as well as an ancient woodland (Nortons Wood 52.542956, 1.231616), break up the open landscape. These features create important wildlife corridors, allowing species to move between habitats in an otherwise open farming landscape. The Applicant states that they have an Exclusion zones Commitment in respect to ancient woodland which can be found at Reference B17 in Table 6.1 of the outline CoCP [APP-300] and refers to the provision of a 15 meter minimum exclusion zone from the edge of ancient woodland. This has been totally disregarded in respect of Nortons Wood, where there is no exclusion zone and a haul road runs directly alongside the west end of the wood

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For many years we have been working with Norfolk Farming and Wildlife Advisory Group (FWAG) who support farmers in South Norfolk to manage land for wildlife enhancement rather than operating specific, named public nature reserves. They have provided us with advice on biodiversity and ecological improvement across the farm. As a result we have created a substantial County Wildlife Site which has been recognised by South Norfolk County Council in the Norfolk Local Nature Recovery Strategy (LNRS) and the Norfolk Biodiversity Information

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**Relevant Representation****The Applicant's Response**

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Service (NBIS) which is a Local Environmental Record Centre holding information on species, geodiversity, habitats and protected sites for the whole of the county of Norfolk . This area, which is adjacent to the location of pylon RG24 has been identified as an Area of Particular Importance for Biodiversity (APIB) and is recognised both locally and national as a site of particular importance. Using the corridor principle for wildlife, the site is linked via woodland, permanent grass land and a chalk stream which is a tributary of the river Tass, to Flordon Common with its SSSI and forms part of the SAC.

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(Redacted) is a short distance from Flordon Common, the key ecological feature in the area. It contains a Site of Special Scientific Interest (SSSI) which is of national importance and Special Area of Conservation (SAC). The SAC designation places it among the most important conservation sites in Europe; it is an exceptional and fragile habitat. The SAC is home to rare species, including the Desmoulin's whorl snail. Other notable wildlife includes water voles, barn owls and Barbastelles bats. Both areas butt up to (Redacted) land and both areas are endangered by pylon RG23 and RG24. With the SAC included, the landscape around (Redacted) is not just farmland. The presence of the SAC means the area is part of a carefully protected ecological network, where water, soil, and land use are tightly linked. The area is peaceful farmland sitting next to a rare, spring-

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**Relevant Representation****The Applicant's Response**

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fed wetland of European importance, where tiny changes in the environment can have big ecological consequences. In conclusion, the damage in ecological terms will be irreversible and no mitigating measures are possible to counter this devastation. In historical terms, the scale of intrusion caused by introducing 50m high pylons on 50m sq. concrete rafts would result in a high level of less than substantial harm to the significance of the grade II\* listed building and associated barns. Whilst the Applicant has made a subjective assessment as to the harm to these historic buildings, they have only provided sufficient information and evidence to support that subjective assessment. Local experts with recognised qualifications and vast experience, disagree with the Applicant's assessments. It is therefore appropriate to conclude that the Applicant has misconstrued the facts in order to support their stated aim and whether by intent or ignorance they have misled others to become complicit in that aim.

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## 4.10 Offton and Willisham Parish Council [RR-3899]

Table 4.10 The Applicant’s comments on Offton and Willisham Parish Council’s Relevant Representation [RR-3899]

Relevant Representation	The Applicant’s Response
<p>I am logging our interest only at this stage whilst our working group collates the comments</p>	<p>The Applicant would like to thank this Interested Party for submitting their representation and notes that a response to the Applicant’s initial relevant representation period (16 October 2025 to 27 November 2025) following acceptance of the DCO application was submitted (see [RR-2767]).</p> <p>As explained on the Planning Inspectorate’s project webpage on 9 April 2026 and throughout the representation period relevant representations must relate specifically to the changes proposed:</p> <p><i>“comments must relate only to the applicant’s proposed provision for the compulsory acquisition of additional land as set out in the applicant’s 27 March 2026 Change Requests application documents [CR1-001] to [CR1-017] (inclusive) and [CR2-001] to [CR2-017] (inclusive), which can be found in the Examination Library. Any comments that are not about this will not be seen by the ExA”.</i></p> <p>The Applicant has previously responded to representations made by Offton and Willisham Parish Council in Section 2 of <b>8.8.1 Applicant’s Comments on Written Representations [REP2-029]</b>, <b>8.4.1 Applicant’s Comments on Relevant Representations [REP2-023]</b>, <b>8.4.8 Applicant’s Comments on any Further Information or Submissions Received by Deadline 2 [REP3-070]</b> and <b>8.4.11 Applicant’s Comments on Further Information or Submissions Received by Deadline 4 [REP5-192]</b>.</p> <p>The Applicant awaits Offton and Willisham Parish Council’s subsequent comments.</p>

## 4.11 Tim Edwards [RR-3904]

Table 4.11 The Applicant's comments on Tim Edwards' Relevant Representation [RR-3904]

Relevant Representation	The Applicant's Response
<p>It is cutting our farm in half, devastating our income at a crucial time of our lives, with an inadequate compensation scheme. The worst thing about the whole scheme is that it is totally unnecessary the power should be brought ashore near the point of demand at Tilbury.</p>	<p>The Applicant acknowledges that this Interested Party is a tenant farmer occupier of an affected party for the Project. However, this Party's interest does not relate to the Applicant's proposed provision for the compulsory acquisition of additional land as a result of the change requests. The Applicant notes that a response to the Applicant's initial relevant representation period (16 October 2025 to 27 November 2025) following acceptance of the DCO application was submitted (see [RR-3673]).</p> <p>As explained on the Planning Inspectorate's project webpage on 9 April 2026 and throughout the representation period relevant representations must relate specifically to the changes proposed:</p> <p><i>"comments must relate only to the applicant's proposed provision for the compulsory acquisition of additional land as set out in the applicant's 27 March 2026 Change Requests application documents [CR1-001] to [CR1-017] (inclusive) and [CR2-001] to [CR2-017] (inclusive), which can be found in the Examination Library. Any comments that are not about this will not be seen by the ExA".</i></p> <p>The Applicant has reviewed the relevant representation received and does not consider that this response relates to Change Request 1 (Bulphan) and/or Change Request 2 (Little Bromley). The Applicant has previously responded to points raised by Tim Edwards' in <b>8.4.1 Applicant's Comments on Relevant Representations [REP2-023]</b>.</p> <p>The Applicant is committed to ongoing engagement with affected landowners to understand and, where reasonably practicable, reduce impacts on individuals' holdings. The Applicant held a site meeting in February 2026 which included both the landowner and this Interested Party. Engagement is ongoing with the landowner (affected party). More details of ongoing dialogue with the affected party can be found in document <b>4.4 Land Rights Tracker [REP5-074]</b>.</p>

National Grid plc  
National Grid House,  
Warwick Technology Park,  
Gallows Hill, Warwick.  
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