

SIR BERNARD JENKIN MP



HOUSE OF COMMONS
LONDON SW1A 0AA

The Examining Authority
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
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Dear Examining Authority

Norwich to Tilbury Project (EN020027) interested party number: [REDACTED]

I write further to the Open Hearings held on 23 June at Chelmsford. As the Member of Parliament for Harwich and North Essex (and Chair of the OFFSET group of MPs), I endorse both the oral evidence presented by my colleague, [REDACTED], and the most recent submission from [REDACTED] on behalf of the Dedham Vale Society. I also wish to comment as follows with respect to the Colne Valley. These areas are part of my constituency.

1. National Policy Statement EN-5 prefers avoidance of National Landscapes.

The Holford Rules, while not part of planning law, remain the best practice framework, which is expected to apply to decisions about overhead powerlines. These rules together with the requirements of NPS EN-5 together demand that the Dedham Vale National Landscape be avoided altogether if possible. What the Buxton submission confirms is that feasible, technical alternatives to AC overhead powerlines and undergrounding have not been properly considered. It is possible that if that policy had been properly applied, the route would not have impacted upon the Colne Valley at all or at least would have been undergrounded. The Project therefore fails the fundamental policy test and is not capable of approval.

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Apparently, NG is advancing an entirely new argument against DC undergrounding the entire route: that this would preclude access to the grid along the route for new developments, such as solar, batteries or industry. This was not part of the original purpose of N2T and, if advanced, it should be discounted.

The ExA will be aware that paragraph 2.9.21 (NPS 2023)/2.9.22 (NPS 2025) sets out a preference for avoiding a National Landscape unless it “cannot feasibly be avoided”. Overhead lines are not an appropriate solution for Essex and East Anglia as a whole, and harm to the Dedham Vale can be avoided by upgrading the existing grid using high-temperature, low-sag converters, an offshore solution or HVDC undergrounding for the entire Norwich to Tilbury route.

The Applicant’s choice of location for EACN, which remains unjustified, causes enormous harm to the Dedham Vale and to the surrounding areas because of the route deviation required to reach it. This solution was not chosen as part of a strategic approach to the required infrastructure to support renewables, but reflects an ad hoc approach driven by a regulatory regime, which everyone now agrees is discredited. Given that HVDC undergrounding may be just as feasible on cost and technical grounds, it is unacceptable that NG have not assessed this option.

It is also perplexing that the option NG have apparently assessed and costed is the idea of HVDC undergrounding just under the Dedham Vale. Who proposed this idea? Nobody serious, as far as any of the MPs is aware. Why has NG assessed this idea at all, except as an ‘Aunt Sally’?

EN-5 also states that in a National Landscape the presumption in favour of overhead lines is reversed, and that “the strong starting presumption will be that the applicant should underground the relevant section of the line” (2.9.21 NPS 2023; 2.9.22 NPS 2025). This brings us to the Colne Valley.



2. NPS EN-5 also sets out an expectation that even residual impact to the Dedham Vale is unlikely to be acceptable in planning terms.

EN-5 at para 2.9.12 states: "in nationally designated landscapes... even residual impacts may make an overhead line proposal unacceptable in planning terms."

EN-1 sets out the general expectation that development consent should only be granted where the proposal is acceptable in planning terms, yet these proposals will cause significant harm to the Dedham Vale. This is not a contentious matter. National Grid recognise and document expected harm to the Vale in their submissions, accepting that pylons will be widely visible across it. NG greatly downplay it. In the absence of proper consideration of the feasible alternatives, the fact that it is admitted to be more than merely residual harm undermines the credibility of the application.

3. The Colne Valley meets the National Landscape tests.

As you are aware, there have been two landscape studies commissioned in the Colne Valley by my constituents, covering the area between Fordham and Aldham. These, and the Applicant's landscape consultant's study, conclude that there is widespread harm to this area.

The study by the Landscape Partnership concludes:

"EN-5 recognises that, whilst overhead lines remain the starting presumption for electricity transmission infrastructure, consideration may be given to alternatives including undergrounding where there is potential for widespread and significant adverse landscape and/or visual effects.

Importantly, the policy makes clear that such considerations are not confined to nationally designated landscapes and should be assessed on a case-by-case basis. Having regard to the identified landscape sensitivity, the concentration of significant landscape and visual effects, the strategic importance of the Colne Valley and Roman River corridors, and the provisions of EN-5, this appraisal concludes that there is a reasonable evidential basis for further consideration of localised undergrounding within this section of the route as a means of reducing landscape and visual effects."



Pylons East Anglia's submission to Deadline 6 includes analysis which demonstrates that the Colne Valley meets the six criteria that a landscape must meet to be considered for AONB status (landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage features, cultural heritage), and I concur with this conclusion.

The Dedham Vale National Landscape and Stour Valley Partnership's published material identifies the special qualities that justify the Vale's designation. These include: an iconic lowland river valley with naturally functioning watercourses and tributaries; semi-natural ancient woodlands on valley sides; historic villages with prominent churches; intact traditional field boundaries; and apparent and buried archaeology reflecting millennia of human activity within the valley landscape.

I draw the Examining Authority's attention to how closely this list maps onto the qualities of the immediately adjoining Colne Valley corridor: ancient woodland on the valley sides (Hillhouse Wood); a naturally functioning river corridor with riparian habitat (the River Colne); historic villages with landmark churches (Fordham's Grade I All Saints Church and West Bergholt's Grade I Old St Mary's Church, situated on opposite sides of the valley); intact historic field patterns and hedgerow boundaries; and buried archaeology of national interest (the Roman burials at the 'Fordham Dig', the uncovering of Roman burial materials by the Applicant itself during exploratory excavations). This is not coincidental. The Colne Valley and the Dedham Vale are not two unrelated landscapes that happen to sit near one another; they are expressions of the same valley-and-tributary landscape type, sharing geology, land-use history and settlement pattern. The Dedham Vale is an outstanding expression of that landscape type, but it is not the only valuable one. The Colne Valley is equally deserving of protection.

The Colne Valley's qualities are not merely theoretical but are demonstrated by significant and sustained public use. The Essex Way, a long-distance recreational route attracting walkers from across Essex and beyond, passes directly through the valley and depends on its scenic and rural character for the quality of the experience it offers. Hillhouse Wood is a well-used and well-loved area of publicly accessible woodland, providing daily opportunities for informal recreation and quiet enjoyment of the valley landscape. The Woodland Trust's landholding at the Fordham Hall Estate similarly attracts significant public visitor numbers, combining public access and biodiversity with archaeological interest, and is a valued local and regional destination. Together, these well-frequented assets demonstrate that the Colne Valley's special qualities are not a matter of professional landscape opinion alone but are recognised and relied upon by the public on a daily basis.



A landscape of this quality, where the harms are agreed to be widespread and significant, therefore meets the test in EN-5 2.9.23 (NPS 2023), 2.9.24 (NPS 2025), “cases will arise where – though no part of the proposed development crosses a designated landscape – a high potential for widespread and significant adverse landscape and/or visual impacts along certain sections of its route may result in recommendations to use undergrounding for relevant segments of the line or alternatively consideration of using a route including subsea cabling.”

NESO’s East Anglia Network Study, and Pylons East Anglia’s analysis, tell us that HVDC undergrounding is feasible, and Richard Buxton points out that they have not refuted this with any substantial evidence. NESO found it broadly comparable in costs to the overhead line option for the whole route between Norwich to Tilbury.

Cable ploughing would further reduce costs and harms. HVDC installed by cable plough, with its narrow construction swathe, would have the added advantage in the Colne Valley of enabling a route which avoids, instead of destroys (and/or destroys the setting of), the great many archaeological sites in Fordham.

The Secretary of State must be confident that the benefits of an underground solution outweigh the harms (EN-5 2.9.25, 2023; 2.9.26, 2025): “In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable.” Pylons East Anglia has demonstrated that this is the case.

4. The Colne Valley is integral to the setting of the Dedham Vale.

The relationship between the two valleys is not merely visual or thematic but physically continuous. The Colne Valley forms part of the same wider green infrastructure and ecological network that extends toward the Dedham Vale, sharing tributary watercourses, woodland cover and hedgerow connectivity. A walker, cyclist or motorist moving through the countryside between Colchester and the designated landscape experiences the Colne Valley not as a distinct or separate place but as the immediate, continuous approach to the Dedham Vale, the landscape through which the transition from urban edge to nationally protected countryside is felt and understood.



This matters because the statutory protection afforded to the Dedham Vale's setting under EN-5 is not limited to land that is itself part of the wider Dedham Vale / Stour Valley project area in a formal planning sense. It extends to any land that in fact shapes the experience, approach to and appreciation of the designated landscape. Where, as here, the adjoining undesignated valley shares the same landform type, the same woodland and watercourse structure, and the same historic settlement pattern as the designated landscape itself, the case that it materially contributes to that landscape's setting is considerably stronger than it would be for a generic or unrelated piece of countryside lying near a designation boundary.

5. Masterplans

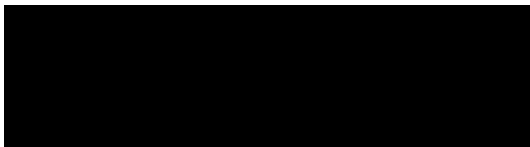
For the avoidance of doubt, the proposals set out in "Document: [8.4.12.2](#) Response to ISH2 Action Point 27 - Masterplans" are not supported in respect of the Colne Valley. They show a lack of due diligence by the Applicant. Areas suggested for meadow land or woodland already are meadowland and woodland under the Woodland Trust's management. Existing environmental assets cannot be presented as mitigations. Areas suggested for green connectivity are country lanes with hedgerows, which already provide green connectivity.

In the Fordham Valley tributary of the Colne, adding a couple of small pockets of woodland and a hedgerow to hide the valley and prevent it from being viewed from the road does not represent an improvement; on the contrary, it is tantamount to vandalism. The open nature of this valley and the far-reaching views afforded to those transiting through it are among its best features and need to be protected. The green areas within the Valley are already interconnected. It is the pylons which are the issue, not the natural landscape. Only undergrounding can improve these proposals in the Colne Valley. I do not advocate rerouting the pylons proposal to any other areas, except offshore. However, failure to consider alternative routes to avoid siting EACN at Ardleigh and to avoid the Dedham Vale altogether would also protect the Colne Valley. This is a further flaw in this application and is why it should be refused.



The Colne Valley is just one part of a 180km linear infrastructure project. It is clear that it meets the tests for undergrounding. However, the enormous harm caused to the rest of my constituency, particularly the village of Ardleigh, and the entire region, by the proposed overhead lines could be avoided through a grid upgrade using high-capacity conductors, offshore coordination or HVDC undergrounding. Given the harms of the Applicant's proposed transmission solution and the benefits of the alternatives, the Secretary of State cannot approve this Development Consent Order.

Yours faithfully



Sir Bernard Jenkin MP

Harwich and North Essex