



Planning Inspectorate

Reference your letter EN020027 dated 5 June 2026 and the Applicants reply at Document: 8.26 Response to Rule 17 Letter received 5th June 2026.

The ExA asked the following question.

3.1.1 ‘At the Accompanied Site Inspection on Wednesday 27 May 2026 the ExA noted the proximity of cottages 70, 71 and High Hopes, Flordon Road (postal address Norwich Road, Flordon, NR15 1RU) to the Order Limits and their relationship with 72 and 73 Flordon Hall Cottages NR15 1RT. These properties have not been assessed in the Residential Visual Amenity Assessment [REP4-148]. The ExA requests an assessment of these properties.

This matter was brought up at the hearing on 25 June 2026 at agenda item 5.4.

I do not propose to include all of the Applicants replies but would like to draw the ExA attention to the following:

3.2 The Applicant’s Response

3.2.1 An explanation is set out in the paragraphs that follow why these properties were not included in the RVAA at submission, however an assessment of the likely change to their visual amenity as a result of the Project is provided at the specific request of the ExA.

Justification for not including the three Properties (*and not all five as asked by the ExA in the above question*), in the Submitted Residential Visual Amenity Assessment (RVAA).

3.2.2 Section 2 of the RVAA [REP4-148] sets out the methodology for the inclusion of properties within the assessment. Paragraph 13.2.4 of the RVAA [REP4-148] states that those residential properties whose curtilages fall within 200 m of the centre line of the permanent above ground elements of the Project – the ‘Study Area’, form part of the assessment. Paragraph 13.2.4 clarifies that this distance ‘was informed by experience, observations made on site during field surveys and an understanding of the Project’. **Note:** *No field studies have been undertaken by the Applicant of the area under consideration, see 3.2.9 that states that the visualisations are not verified views (as data from their locations has not been collected in person).* It also draws upon the Landscape Institute’s ‘Technical Guidance Note2/19: Residential Visual Amenity Assessment’ (LI TGN 2/19)1. Paragraph 4.7 of LITGN 2/19 states that ‘when assessing effects of overhead transmissions lines, generally, only those properties within 100 – 150 metres of the finalised route are potentially considered for inclusion in a RVAA’. The RVAA [REP4-148] extends its Study Area up to 200 m in order to allow for the Project’s lateral Limits of Deviation (LoD).

Whilst I would accept that some of my disagreements with this answer are subjective, there are significant errors in what they have produced, both in terms of the RVAA and the

pictorial submissions. The applicant has not answered the question and failed to mention the properties No 72 and 73 Flordon Road, NR15 1RT in the response. Both these houses are within 120 and 130 meters of pylon RG 21 respectively and so would become subject to the RVAA as determined by the Applicants own admission in paragraph 4.7 of LI TGN 2/19 which states that ‘when assessing effects of overhead transmissions lines, generally, only those properties within 100 – 150 metres of the finalised route are potentially considered for inclusion in a RVAA’. The RVAT is defined in paragraph 2.1 of LI TGN 2/19 as the point ‘at which the visual amenity of a residential property is changed and adversely affected to the extent that it may become a matter of Residential Amenity and which, if such is the case, competent, appropriately experienced planners will weigh this effect in their planning balance’. To compound the problem, it has only recently come to light that trees and hedges in the curtilage of No 72 Flordon Rd will be removed to facilitate the undergrounding of electrical cables that are currently in place. The kitchen window and a bedroom window of property no 72 Flordon Road look directly towards pylon RG 21 and the removal of the vegetation will have a dramatic effect. Paragraph 13.2.26 of the RVAA [REP4-148] states that the RVAT is judged by considering whether the Project, for example blocks the only available view from a property, is overwhelming in views in all directions from the property, is unpleasantly encroaching and / or is inescapably dominant from the property. No 72 Flordon Road in particular will have pylons RG 21 and RG 22 clearly and inescapably dominating all views from the property.

In respect of houses at 70 and 71 Flordon Road and the House, High Hopes, both the measurement distances recorded and the Viewpoint pictures are wide of the mark. Furthermore, if the maps presented are accurate and RG 22 is at the point marked, then the measurements they claim to the curtilage are inaccurate. When measured accurately on the ground they are wrong by at least 15 meters, this begs the question, how many other measurements are inaccurate? The viewpoint pictures are interesting. 3.2.9 states that the visualisations are not verified views (*as data from their locations has not been collected in person*). For once it seems that I must agree with the Applicant; this must be one of the most accurate statements they have made. It is very evident that the illustrations bear no similarity to reality and that whomever produced them, had never set foot on that area of the farm. We are not sure whose fields the visualisations are depicting but they have no resemblance to ours, even taking into account that they purport to show the hedges and trees in winter.

To clarify and to eliminate any doubt, High Hopes has a plain 5-foot-high wooden panel fence surrounding the property on all sides. It has two vehicle gateways, (in and out), on the west side leading onto Flordon Road. There are no trees, hedges of vegetation that would obscure the view of Pylon RG 22 from the property. You can currently see 9 existing pylons for High Hopes Garden and in excess of 15 from the east and south facing bedroom windows. There will also be a clear view of pylon RG 23 from the south and west facing bedroom windows. The Applicant also states the following in respect of cumulative development within the area:

Table 3.2 Assessment of likely change to visual amenity – High Hopes (A28) Cumulative development SN44 (installation of a BESS including associated infrastructure and landscaping) would be located approximately 500m to the north-west of this property. Views to this would be severely prevented by the: existing tall mature hedgerow to the west of Flordon Road past High Hopes; the tree groups along Wymondham Road; and the proposed planting around the cumulative development. Consequently, no significant cumulative effects are anticipated. Unfortunately, we have been notified that due to the required road

realignment/widening and the proposed Bell Mouth structures, most of the trees and all of hedges (1.3km) are going to be cut down along the Wymondham Road and part of Flordon Road. This is to enable the Applicant to bring in the steels etc from the direction of the B1113. Therefore, to state that there will be no significant cumulative effects is at best disingenuous.

In the Applicants summary they state at 3.4.3 The assessment identified that only one of the three properties – ‘High Hopes’, would be expected to experience a high magnitude of change to its visual amenity. Even when considering the worst-case scenario of the Project maximising its use of the Limits of Deviation. Nos. ‘70’ and ‘71’, Flordon Road were found to experience a low medium magnitude of effect. This summary misses the effect on the properties at No 72 and 73 Flordon Road which cannot fail to experience a high magnitude of change to their visual amenity. Not only will the pylon RG 21 be within 120m but the high voltage power cables span will be even closer.

Frustratingly in respect of the Cottage and High Hopes, if the route had been altered as originally suggested, about 400m north west, then none of this would have been a problem. I was informed that the route could not change primarily because of the Holford Rules, in particular, rule 3. This rule states the following: **Other things being equal**, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers. Well clearly, not all routes were equal. One way there were no houses and minimal impact on the farm and the other way is the one they are fostering upon us, with a huge impact on people’s lives and devastating to the farm. It appears that in respect of the Holford Rules the applicant is failing them in most if not all respects.

So, in sum, the Applicant has failed to answer the exam question accurately and honestly. The answer clearly contradicts itself and shows that their assessment process is flawed. This is only one small part of the route; if this is inaccurate and deliberately misleading and clearly a breach of the Holford Rules, how can any part of their route planning be considered for onward progression? I am at a loss as to how we are meant to respond to this sort of inaccurate and misleading information. We are trying our best to come to terms with the intended structures but the applicant’s misrepresentation of the facts makes it extremely difficult to respond with certainty and clarity.

Nick Cheeseman [REDACTED]

Rex Webster: [REDACTED]