

Norwich to Tilbury Electricity Transmission Project (EN020027)

Interested party number [REDACTED]

Deadline 7 Submission

Response to Document 8.4.14 – Applicant's Comments on Further Information Submitted at Deadline 5

Ford Street Conservation Area, Fordham, Aldham and the Colne Valley

Introduction

This submission responds solely to the Applicant's comments contained within Document 8.4.14, insofar as they relate to Fordham, Ford Street Conservation Area, Aldham and the wider Colne Valley.

The Applicant's comments do not engage with the substance of the evidence submitted at Deadline 5. Instead, the Applicant largely repeats previous conclusions or refers the Examining Authority back to earlier documents without addressing the factual and technical criticisms advanced.

The issue before the Examining Authority is therefore not whether the Applicant has previously expressed a contrary opinion. The issue is whether the Applicant has properly engaged with the evidence submitted at Deadline 5 and demonstrated why that evidence should be rejected.

Respectfully, it has not.

The Applicant Has Responded by Reference Rather Than by Reasoning

Throughout Document 8.4.14, the Applicant's response to the submissions concerning Fordham, Ford Street and Aldham follows a consistent pattern. Rather than analysing the evidence submitted, the Applicant repeatedly refers the Examining Authority back to earlier documents and states that its position remains unchanged.

This is not a substantive response to the matters raised at Deadline 5.

The purpose of Document 8.4.14 is to address further information submitted during the Examination. Merely referring back to previous submissions does not explain why the detailed evidence submitted at Deadline 5 is said to be incorrect.

Consequently, the Applicant has not engaged with the substance of the Deadline 5 representations.

Failure to Address the Evidence on Cumulative Effects

The principal issue raised at Deadline 5 was not whether individual receptors had been identified. Rather, the submissions demonstrated that the Applicant had failed to assess the cumulative interaction of the multiple environmental, heritage, landscape and recreational receptors concentrated within the TB046–TB057 corridor. Document 8.4.14 does not answer that criticism. Instead, the Applicant reiterates its previous assessment and maintains that the chosen alignment remains appropriate.

Nowhere within Document 8.4.14 does the Applicant undertake a cumulative assessment of:

- Ford Street Conservation Area;
- the concentration of listed buildings;
- Grade I and Grade II* churches;
- Roman archaeological remains;
- Woodland Trust land;
- the Essex Way;
- public rights of way;
- floodplain landscapes;
- biodiversity corridors; and
- residential communities

as one interconnected landscape.

The Deadline 5 evidence demonstrated that these receptors are not isolated but interact spatially, visually and functionally within the same valley landscape. Document 8.4.14 contains no analysis of that evidence.

Failure to Address the Detailed Topographical Evidence

The Deadline 5 submissions provided detailed evidence challenging the Applicant's repeated assertion that the alignment follows valley landform and minimises landscape effects. That evidence demonstrated, amongst other matters, that:

- TB047 and TB048 occupy elevated positions overlooking Ford Street;
- TB050 remains significantly above the valley floor despite references to lower land;
- TB052 and TB053 occupy prominent ridgeline positions;
- extensive tree removal will reduce rather than increase landscape screening; and
- the resulting skyline intrusion will fundamentally alter views across the Colne Valley.

These matters were supported by contour plans, topographical evidence, visualisations and photographs. Document 8.4.14 contains no technical rebuttal of that evidence. Instead, the Applicant simply repeats its previous design narrative. The Applicant therefore fails to explain why the specific topographical evidence submitted at Deadline 5 should be rejected.

Failure to Address the Heritage Evidence

The Deadline 5 submissions identified the concentration of heritage assets within Fordham, Ford Street and Aldham, including:

- Ford Street Conservation Area;
- approximately sixty-four listed buildings;
- Grade I and Grade II* listed churches;
- Roman archaeological remains; and
- the historic relationship between those assets across the wider valley.

The submissions further demonstrated that these assets should not be considered individually but as components of one historic landscape. Document 8.4.14 does not address that evidence. Instead, the Applicant maintains its previous assessment without explaining why the cumulative heritage evidence submitted at Deadline 5 should be rejected.

The Applicant fails to engage with the principal criticism advanced.

Failure to Address the Waveney Valley Comparison

The Deadline 5 submissions did not merely advocate undergrounding. They demonstrated that the Applicant had adopted different assessment methodologies when considering undergrounding within the Waveney Valley and the Colne Valley.

The criticism was therefore directed at consistency of methodology rather than consistency of outcome. Document 8.4.14 does not answer that criticism. It does not explain why cumulative environmental sensitivity justified undergrounding considerations within the Waveney Valley but not within the Colne Valley. Nor does it explain why no equivalent cumulative assessment has been undertaken for the Colne Valley before undergrounding was rejected.

Failure to Address the Holford Rules Evidence

The Deadline 5 submissions identified numerous examples where the proposed alignment appeared inconsistent with the principles embodied within the Holford Rules, including:

- siting of pylons upon elevated ground;
- increased ridgeline visibility;
- failure to utilise landform to reduce prominence;
- increased skyline intrusion; and
- reduced effectiveness of existing woodland screening owing to extensive tree removal.

These matters were supported by mapped evidence and photographs. Document 8.4.14 contains no detailed response to those examples.

The Applicant fails to explain why the site-specific evidence submitted at Deadline 5 should be rejected.

The Applicant Has Not Rebutted the Evidence Submitted at Deadline 5

The Applicant is entitled to disagree with Interested Parties. However, disagreement alone is not a substitute for analysis. The detailed Deadline 5 submissions raised specific factual, technical and methodological criticisms supported by documentary evidence. Document 8.4.14 does not explain why those criticisms are incorrect. Instead, it simply reasserts conclusions already reached elsewhere within the Applicant's evidence.

The effect is that the Applicant has not materially engaged with the additional evidence placed before the Examination.

Conclusion

Document 8.4.14 does not provide a substantive response to the evidence submitted at Deadline 5 concerning Fordham, Ford Street Conservation Area, Aldham and the Colne Valley.

The Applicant has not addressed the detailed evidence relating to:

- cumulative effects;
- landscape character;
- topography;
- heritage;
- the Holford Rules;
- undergrounding methodology; or
- the comparison with the Waveney Valley.

Instead, the Applicant has largely repeated earlier conclusions without explaining why the detailed evidence submitted at Deadline 5 should be rejected.

The Examining Authority is therefore respectfully invited to attach limited weight to the Applicant's comments contained within Document 8.4.14 insofar as they relate to Fordham, Ford Street Conservation Area, Aldham and the Colne Valley.