

Deadline 7 Written Representation
Response to the Applicant's Deadline 5 Comments
Ford Street, Colne Valley, Aldham and Fordham

1. Introduction

This representation responds to the Applicant's Deadline 5 comments concerning the Ford Street, Colne Valley, Aldham and Fordham section of the proposed Norwich to Tilbury 400 kV overhead line. It is submitted that the Applicant has not adequately addressed the substantive concerns raised by Interested Parties regarding landscape, heritage, cumulative effects and reasonable alternatives. Instead, the Applicant largely relies upon repeated cross-references to earlier submissions without engaging directly with the evidence presented.

2. Cumulative Landscape Effects

The Applicant has not demonstrated that it has undertaken a comprehensive assessment of the cumulative effects arising from the combination of overhead transmission infrastructure, associated construction activity, woodland loss and other proposed energy infrastructure. The principal issue is the transformation of the character of the Colne Valley as a coherent historic landscape rather than the isolated visibility of individual pylons. Repeated references to earlier assessments do not address the substance of the concerns raised. The rural road network of the area could also not support the construction activity required.

3. Ford Street Conservation Area

The Applicant has not satisfactorily addressed the effect of the proposed overhead line on the setting of the Ford Street Conservation Area. The proposed alignment would introduce prominent vertical infrastructure into views that currently derive their significance from the rural and undeveloped character of the valley. Reliance upon future replacement planting cannot mitigate the immediate or medium-term loss of mature landscape structure or preserve the significance of the designated heritage asset.

4. Topography and Route Alignment

Although the Applicant states that the route follows the Holford Rules, insufficient evidence has been provided to demonstrate that individual tower locations have been optimised to minimise landscape harm. The siting of pylons on elevated ground and within key viewpoints across the valley materially increases visual prominence and interrupts established landscape character.

5. Heritage Considerations

The Applicant's response focuses principally on archaeological matters and does not adequately consider the cumulative impact upon the setting of heritage assets, including Ford Street Conservation Area, Aldham Church, the Essex Way and the wider historic landscape. The interaction between these assets has not been fully evaluated in terms of the destruction of countryside amenity, businesses that rely on the heritage setting, and the overall effect on the landscape.

6. Woodland and Landscape Structure

The proposed removal of mature trees and woodland cannot be adequately mitigated through replacement planting. Mature landscape features provide immediate visual screening, ecological value and historic continuity that will take decades to replicate. Consequently, the residual landscape effects have been massively understated by the applicant.

7. Flood Risk and Local Conditions

The Applicant's reliance on strategic flood mapping does not adequately reflect significant seasonal recurring localised flooding and surface water conditions experienced in the vicinity of Ford Street. Site-specific evidence indicates that further investigation must be urgently carried out before the effects of the development can be properly understood.

8. Independent Landscape Evidence

The independent Landscape Partnership assessment concludes that the Colne Valley is a landscape of high sensitivity and that the proposed overhead line would give rise to widespread and significant adverse visual effects. It further identifies undergrounding as an option that merits consideration in accordance with National Policy Statement EN-5. The Applicant has not provided a persuasive rebuttal of these conclusions.

9. Alternatives

The Applicant's persistent dismissal of alternative alignments and partial undergrounding does not demonstrate that all reasonable alternatives have been properly evaluated. National policy requires alternatives to be considered where they would materially reduce significant adverse landscape and visual effects.

10. Conclusion

For the reasons set out above, it is respectfully submitted that the Applicant has not demonstrated that the proposed development satisfies the requirements of the National Policy Statements in relation to landscape protection, heritage conservation, cumulative effects or the consideration of alternatives. The Examining Authority is therefore invited to give significant weight to the evidence submitted by local communities and independent landscape specialists, and to conclude that further route refinement and/or undergrounding should be required before development consent can properly be granted.

Requested Action

The Examining Authority is respectfully requested to:

- conclude that the cumulative landscape and heritage effects within the Colne Valley have not been adequately assessed;
- require further consideration of alternative alignments and partial undergrounding through the most sensitive sections of the valley;
- give substantial weight to the independent landscape evidence submitted during the Examination; and
- conclude that the current proposal has not demonstrated compliance with the relevant provisions of NPS EN-1 and NPS EN-5.