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Representations - Part 2 - Tracked Changes Version**

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nationalgrid

2.37 Little Bromley Parish Council

2.37.1 Table 2.37 below outlines the Applicant’s comments on the Relevant Representation (RR) provided by Little Bromley Parish Council [RR-2172]. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 2.37 Comments and National Grid’s response

Topic	Comment	National Grid’s response
Alternatives	I am submitting this Relevant Representation on behalf of Little Bromley Parish Council (LBPC) in relation to National Grid’s (NG) Norwich to Tilbury Nationally Significant Infrastructure Project (NSIP). LBPC strongly objects to the proposals as the proposals fail to identify and consider the best and least harmful approach to grid expansion. In particular, LBPC has concerns about the proposals as they relate to the Parish of Little Bromley, most notably the siting of the East Anglia Connection Node (EACN), a permanent access road from the centre of Little Bromley to the EACN and cabling infrastructure	Overall, alternative locations for the East Anglia Connection Node (EACN) Substation closer to the coast as well as alternatives further inland have been considered. This was after locations in the general vicinity of Felixstowe were considered but not taken forwards. The selected location east of Ardleigh balances the effects arising from connection corridors and substations for the Applicant and for those with signed connection agreements and takes into consideration routeing of one of the Applicant’s connections by underground cable. The preliminary location for the EACN Substation was developed as set out in 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] as part of an iterative process also considering the onward connections. This document identifies the alternative sites considered at that stage of study. Other locations including the former Royal Air Force Boxted have been considered as they have been raised through consultation and the Applicant’s position on them set out in the various Design Development Reports [APP-122, APP-358, APP-359 and APP-360]. Whilst noting that routeing through the National Landscape is not in conflict with National Policy Statement (NPS) EN-1 (2024) and NPS EN-5 (2024) there were alternatives considered that would avoid routeing through the National Landscape.
Landscape and Visual	NG’s current alignment would irreversibly damage the unique character, landscape, and	The Applicant notes the concerns raised by Little Bromley Parish Council. The matters are considered in turn below: <u>a)</u> d) Landscape and visual effects

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		Viewpoint assessment findings also identify significant and adverse visual effects. This includes views from Little Bromley Parish looking to the west as represented by Viewpoint 3.13 within 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 2 of 4 [APP-230]), pdf page 119. Effects on landscape receptors within Little Bromley Parish are set out in 6.13.A2 Environmental Statement Appendix 13.2 – Landscape Baseline and Assessment [APP-228] under Landscape Character Area (LCA) 7A Bromley Heaths in paragraphs 13.3.375 to 13.3.391. The assessment of construction effects on landscape and visual receptors recognises that there would be direct effects arising from construction including the removal of some landscape features, including the loss of hedgerows and trees. The LVIA set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] is based on an assumed worse case tree and hedgerow removal as detailed within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] and illustrated on pages 190 and 193 to 195 of 352 of 6.13.A6 Environmental Statement Appendix 13.6 - Arboricultural Impact Assessment [APP-236]. Paragraph 8.2.3 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) confirms that, following detailed design and prior to construction, relevant surveys would be undertaken to reduce removal of trees/hedgerows as far as practicable, and this is recorded as commitment GG14 within 7.2 Outline Code of Construction Practice (Revision C). Measures to avoid/mitigate impacts to all trees is also a Project commitment: LV05 in 7.2 Outline Code of Construction Practice (Revision C). Section 9.4 of 7.4 Outline Landscape and Ecological Management Plan (Revision D) outlines the commitment to reinstate hedgerow field boundaries. <u>b)</u> e) <i>Historic environment</i> Through routeing and siting the Applicant has sought to reduce as far as practicable, potential impacts on the historic environment in Little Bromley Parish. The impacts of the Project on the historic environment are assessed in 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] and 6.11.A2 Environmental Statement Appendix 11.2 - Historic Environment Assessment Tables [AS-070]. The assessment considers the potential impact on archaeological remains, historic buildings and historic landscapes and includes assessment of potential for physical impact, impact through

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		change to setting that affects the value of a heritage asset and impact through indirect factors such as change in hydromorphology. The assessment is supported by walkover, setting and geophysical surveys, as documented in 6.11.A1 Environmental Statement Appendix 11.1 - Historic Environment Baseline Report [APP-209] and 6.11.A4 Environmental Statement Appendix 11.4 - Geophysical Survey (Priority Areas) Results Report – Part 1 [AS-072]. Archaeological trial trench evaluation has also been undertaken and is reported in 6.11.A5 Environmental Statement Appendix 11.5 - Trial Trenching Results Report [APP-213 and AS-078]. In addition to the proposals in the 7.4 Outline Landscape and Ecological Management Plan (Revision D), the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] sets out appropriate mitigation for the historic environment. The Applicant has engaged with Historic England and Local Planning Authorities on aspects relating to heritage, including appropriate mitigation measures and techniques and to take their views into account during Project development. 6.11 Environmental Statement Chapter 11 - Historic Environment [AS-068] provides an assessment of the Project's likely significant effects on designated and non-designated heritage assets in Little Bromley Parish. The Project will not result in any substantial harm to designated heritage assets. <u>c)</u> f) <i>Ecological effects</i> Through routeing, siting and detailed design, the Applicant has followed the mitigation hierarchy, seeking to reduce, as far as practicable, potential impacts on ecological features within the Little Bromley area. The design process has taken account of existing biodiversity, the natural environment and, where practicable, has sought to reduce impacts on areas of ecological sensitivity, through avoidance or mitigation. 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] assesses the effects on important ecological receptors. As part of the Environmental Impact Assessment process for the Project, a suite of ecological surveys has been undertaken over the 2022–2025 period, the findings of which have informed the design and approach to mitigation. 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) include good practice measures to avoid or reduce impacts on valuable habitats and species and mitigation measures as

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	relevant code has been issued).	
Planning policy	<u>1.</u> 3. THE IMPACT OF THE APPLICATION ON THE SENSITIVE LANDSCAPE AND HERITAGE ASSETS ALONG THE ROUTE. The Group believes that National Grid's (NG) legal duty under Schedule 9 of the Electricity Act 1989 has not been met, given the other options to mitigate impact by alternative means of transmission; or, in the Chelmsford area, by an alternative route.	The Applicant does not agree with the respondent as it must, and its position is that it does, meet its duties across a range of regulatory requirements. On this particular point Section 2.3 of 5.6 Planning Statement [APP-085] sets out how the Electricity Act 1989 applies statutory duties to the Applicant in developing and maintaining the national electricity transmission network. These statutory duties are referenced and reflected in National Policy Statement (NPS) EN-5 (2024), the relevant national policy statement for nationally significant electricity transmission infrastructure. 5.6 Planning Statement [APP-085], in assessing and evidencing the overall compliance of the Project with the relevant NPS and other planning policy, also sets out how the Applicant has had due consideration to its statutory duties under the Electricity Act 1989. We address the question of why other routes are less preferred partly at item 3 below and partly as set out in the 5.15 Design Development Report [APP-122] in Section 9.2 and paragraph 9.2.4 in particular
Landscape and Visual	The landscape and visual harms arising from the proposal are set out in a study by Alison Farmer Associates, commissioned by the Group (attachment to follow).	This is responded to in our response to item 3 below.
Planning policy	In addition to landscape, visual and heritage considerations, the Group contends that, given the alternatives, insufficient regard has been paid to: topography and the application of Holford Rules 4 and 5;	The Applicant disagrees that the Holford Rules have not been considered or given insufficient regard. 7.18 2022 – Corridor and Preliminary Routeing and Siting Study [APP-356] published in 2022, and the Design Development Reports (DDR) published as part of the 2023 non-statutory consultation (7.20 2023 - Design Development Report for the Project [APP-358]), 2024 statutory consultation (7.21 2024 – Design Development Report for the Project [APP-359]) and with the application for development consent (5.15 Design Development Report [APP-122]), all set out how the Holford Rules informed decision making. We use the Environmental Impact Assessment process to inform the balance and define our proposals that we take

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		within approximately 1.5 km of the Brentwood Hills LCA (paragraphs 13.3.736 to 13.3.756). In relation to agricultural land, the assessment of impacts on best and most versatile land is set out in 6.6 Environmental Statement Chapter 6 - Agriculture and Soils [APP-138]. This includes the mapping (in 6.6.F3 Environmental Statement Figure 6.3 - Detailed Agricultural Land Classification (ALC) Mapping [APP-143]), from detailed Agricultural Land Classification (ALC) surveys, of the extent of each land grade within North-West and South-West of Chelmsford Parishes (predominantly Grade 3a land with smaller extents to Grade 2 and Grade 3b land).
Alternatives	2.4 INSUFFICIENT CONSIDERATION OF ALTERNATIVE METHODS OF ELECTRICITY TRANSMISSION, SUCH AS OFFSHORE AND UNDERGROUND HVDC SYSTEMS, INCLUDING THE LIFETIME COST BENEFITS OF THESE ALTERNATIVES. The methodology underlying the application appears to ignore that electricity is generated in the North Sea, not in Norwich. Even accepting the starting point of Norwich as a given, the application does not give sufficient regard to the advantages of underground HVDC cabling over this extensive distance of 180km,	The Applicant disagrees and its position is that it has carefully considered alternatives throughout the development of the Project and presented information setting out why the alternatives were less preferred. 7.19 2023 - Strategic Options Backcheck and Review [APP-357] considered all onshore alternatives of alternating current (AC) overhead line, AC cable, AC gas insulated line and high voltage direct current (HVDC) options, and offshore options of AC subsea cables and HVDC alternatives. In all cases the HVDC onshore and offshore alternatives were significantly more expensive than overhead line alternatives whilst not providing the system flexibility and full capacity as the AC alternative. As set out in Chapter 15 of 7.19 2023 - Strategic Options Backcheck and Review [APP-357] the total capital cost for overhead line options EAN 4 and EAS 2 would be £895 million whilst for the HVDC offshore 1 option the total capital cost would be £4,096.5 million (2020/21 price base). The Applicant also notes that all options are associated with other costs but, as set out in the recent Institution of Engineering and Technology: A Comparison of Electricity Transmission Technologies: Costs and Characteristics⁷⁰, the differences are stark. Even allowing for some underground cable sections as mitigation, overhead line solutions remain less than half the cost of HVDC, with fewer technical disadvantages. Technical issues with the HVDC alternatives include the lack of commercially available HVDC circuit breakers. Without HVDC circuit breakers offshore grids cannot connect large networks together with power generation infeed above 1,800 MW as set out in the Security and Quality of Supply Standards. This is because a fault on a highly

⁷⁰ Institution of Engineering and Technology (2025) *A Comparison of Electricity Transmission Technologies: Costs and Characteristics*

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	as an alternative to overhead lines with the significant component of higher cost HVAC cabling in the Dedham Valley National Landscape. The Group is also unconvinced that the full cost of overhead lines has been fully included, when taking into account compensation to affected property owners, bill reductions to affected homes, Biodiversity Net Gain, carbon emissions, etc (not to mention community capital).	interconnected HVDC grid without an HVDC circuit breaker, would cause the whole HVDC network to shut down under fault. Losing more than 1,800 MW of power on the National Electricity Transmission System would cause a significant frequency deviation on the grid, which could lead to a national loss of the system. This currently limits the interconnectivity and size of HVDC systems.
Alternatives	3 4. ALTERNATIVE ROUTING OF OVERHEAD LINES IN THE CHELMSFORD AREA. Even accepting overhead cabling as a given, it is very clear that NG has not fully considered the option of an alternative route to the east and south of Chelmsford. The attached report by Alison Farmer Associates has studied the relative harms of these alternatives and concludes that an alternative route to the east of Chelmsford, close paralleling the existing 440kv overhead line by undergrounding and replacing sections of the	The Applicant would remind the Examining Authority that its starting point for the assessment is the government's strong starting presumption for overhead lines. It also notes that there are circumstances when this presumption is reversed and underground cable is utilised or where effects exceed defined thresholds for landscape effects and cable can be justified. However, no such locations that could achieve the reversal of the National Policy Statement (NPS) EN-1 (2024) provision are present, nor meet the threshold for consideration of underground cables. The Applicant would also note that a number of engagements have been undertaken with a representative of this group at various consultation events and direct contacts. The suggested alternatives propose different arrangements for seeking to lead to a re-location of the proposed connection. In terms of routes further to the west we would refer the ExA to the 5.15 Design Development Report [APP-122] and specifically our conclusions at paragraph 9.2.4 that it was less preferred as whilst reducing some effects it transferred others and was longer and less direct. Other changes, including those reviewed in the Alison Farmer report, also seek to change the route from passing to the north and west of Chelmsford and to instead pass to the east of Chelmsford. From here there are alternatives to south-west and south-east to connect to Tilbury. The main rationale for the move has been cited to us as to seek to route the new connection in the

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Consultation	4.2. DEFICIENCIES ARISING FROM NG'S 'DECIDE AND DEFEND' APPROACH TO DECISION-MAKING AND CONSULTATION. Whilst accepting that the Inspectorate has concluded that the application meets minimum standards for consultation, the Parishes Group contends that the application does not conform to broader consultation requirements, such as the Gunning Principles which require inter alia that consultation takes place when 'Proposals are still at a formative stage' and 'A final decision has not yet been made, or predetermined, by the decision makers.'	This Project comprises a proposed overhead line connection over 2 km in length and therefore it is classified as a Nationally Significant Infrastructure Project (NSIP). Therefore, the Project would require consent under the Planning Act 2008. The government and Planning Inspectorate publish statutory guidance and advice on developing an NSIP for developers to follow. The authors of that guidance had specific regard to the Gunning Principles as they apply to the context of NSIPs. The Applicant has developed its proposals and carried out consultation in accordance with the statutory guidance and the relevant Gunning Principles. The Planning Inspectorate accepted the application into examination having regard to the adequacy of pre-application consultation. A detailed response with regards to our application of the Gunning Principles can be found in 5.1 Errata Consultation Report - Appendix N: Legal Opinions [REP1-007].
Consultation	NG appears to follow a different approach of making decisions internally, informing affected communities and then seeking to take account of objections through a complicated system of 'back-checking' – which is inevitably no substitute for open consideration of options at the outset. Leaving aside deficiencies of due process, the	The Applicant notes that any and all routes have the potential for effects and changes such as proposed by the respondent will transfer effects to other homes and environmental receptors. The Applicant notes the concerns raised by the Parishes Group regarding the approach to engagement and the consideration of routeing options around Chelmsford, but does not agree that decisions were made internally and then retrospectively justified through consultation. Route selection and design development were informed through an iterative process that combined technical, environmental and consultation inputs from the outset, rather than a predetermined approach. Non-statutory consultation undertaken in 2022 and 2023 sought views on a corridor and graduated swathe and feedback received at this stage informed the identification and refinement of emerging proposals. Local knowledge and

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		and landscape). The likely health effects as a result of changes to visual amenity once the Project is constructed are assessed in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [APP-192]. The assessment concludes that whilst there are likely to be individuals in every ward intersecting with the Order Limits who experience some degree of impact on their mental health and wellbeing (for example anxiety or stress) due to the operation (and maintenance) phase of the Project, evidence also suggests habituation and adaptation with time and no significant effects on health and wellbeing are anticipated. The assessment draws on findings set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226], and specifically 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234] (RVAA), which contain an assessment of the visual impacts of the Project on residential properties. Paragraph 13.2.26 of the RVAA describes the various tests applied to understand visual impact. Two properties to the south of Tacolneston meet the thresholds for inclusion in the RVAA. Table A13.4.3 of 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233] summarises the outcome of the assessment for these properties, concluding that although they would be affected by a moderate change to visual amenity in the round, this constitutes a medium magnitude of effect and is therefore not considered sufficient to trigger further assessment. Overall, the RVAA concludes that there are no instances where effects on residential visual amenity would be so great that they would affect living conditions and render those properties unattractive places to live.
Landscape and Visual	1. 5.-Detrimental Impact on Visual Amenity and Landscape Character The proposed route cuts directly through the heart of the unspoiled and tranquil rural landscape of South Norfolk. Tacolneston is situated within a predominantly agricultural and ecologically sensitive area. The	The Landscape and Visual Impact Assessment (LVIA) set out in 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226] identifies significant adverse residual effects on landscape receptors up to a distance of approximately 1.5 km, and on visual receptors up to a distance of approximately 2 km. Embedded and standard mitigation measures of relevance to landscape and visual effects are summarised in Section 13.6 of 6.13 Environmental Statement Chapter 13 - Landscape and Visual [APP-226]. In this context, the Applicant notes that NPS EN-5 (2024) recognises that it is not possible to fully mitigate the landscape and visual effects associated with electricity transmission infrastructure.

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	introduction of 50-meter-high steel lattice pylons will irrevocably industrialise this beautiful landscape. The sheer scale of the pylons will constitute an unacceptable, dominating, and permanent scar on the horizon, destroying the character of the countryside which is valued by both residents and visitors. The Parish Council maintains that this visual intrusion is disproportionate to the perceived national benefit and represents a failure to respect the local environment.	Effects on visual receptors within Tacolneston Parish Council are set out under Visual Receptor Areas (VRAs) A5 and A6 in paragraphs 13.4.49 to 13.4.71 in 6.13.A3 Environmental Statement Appendix 13.3 - Visual Baseline and Assessment - Part 1 of 4 [APP-229]. Effects on landscape receptors within Tacolneston Parish Council are set out in 6.13.A2 Environmental Statement Appendix 13.2 - Landscape Baseline and Assessment [APP-228] under Ashwellthorpe Plateau Farmland Landscape Character Area (LCA) in paragraphs 13.3.81 to 13.3.96 and Tas Tributary Farmland LCA in paragraphs 13.3.111 to 13.3.125. Impacts on Residential Visual Amenity have been considered in 6.13.A4 Environmental Statement Appendix 13.4 - Residential Visual Amenity Assessment [APP-233 and APP-234]. This has been produced in line with Landscape Institute Technical Guidance Note 2/19 Residential Visual Amenity Assessment⁷⁸ and assesses where permanent changes to visual amenity, as a result of the introduction of pylons and overhead line, may affect living conditions at specific properties within 200 m of the Project centreline, and where the Residential Visual Amenity Threshold (RVAT), as described in Technical Guidance Note 2/19, may be breached. The assessment recognises that there would be significant change to views from properties within Tacolneston, but the RVAT is not anticipated to be breached in this location.
Biodiversity, ecology and nature conservation	<u>2.</u> 6. Environmental and Ecological Damage The construction and presence of this vast infrastructure will result in significant and unavoidable ecological damage. The construction phase alone will involve heavy vehicle movement, habitat fragmentation, and disruption to local watercourses and soil health. Furthermore, the	This area of land within the Order Limits, between Tacolneston and Fornsett St Mary, has been subject to a full range of ecological surveys over 2022–2025. These surveys have included habitats, bats, badgers, water vole, otter, reptiles, invertebrates and birds. The survey results and assessment of impacts on ecological receptors are presented within 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] and the associated ecological appendices. This assessment has included potential disturbance and fragmentation impacts on relevant ecological receptors. <u>7.4</u> 7.4 Outline Landscape and Ecological Management Plan (Revision D) and 7.2 Outline Code of Construction Practice (Revision C) set out a comprehensive mitigation strategy for habitat loss (temporary and permanent) and any impacts, including fragmentation and disturbance, on protected species as agreed with Natural England and Local Planning Authorities.

⁷⁸ Landscape Institute (2019) *Technical Guidance Note 2/19 Residential Visual Amenity Assessment*

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	permanent 'pylon highways' and maintenance requirements will require the clearance of natural vegetation, disrupting established ecosystems and local wildlife corridors.	In addition, the Applicant has committed to deliver 10% Biodiversity Net Gain (BNG) with environmental and societal benefits, which include watercourse biodiversity units. Soil management measures to be implemented during construction across the Project, including across Tacolneston Parish, to protect the soil resource (including the health of the resource), are detailed in 7.2 Outline Code of Construction Practice Appendix C - Outline Soil Resource Plan (SRP) [APP-303]. The Outline SRP provides strategy, guidance and methodology in relation to the key soil mitigation measures required to protect soil resources during the stages of pre-construction, construction, post construction, and operation (and maintenance). Implementation of these measures will ensure the land can be restored to its previous condition, which includes its Agricultural Land Classification grade, or as agreed with the landowner. Mitigation measures would be implemented during construction to reduce the risk of disruption to watercourses including those across Tacolneston Parish. These measures are considered within 6.12 Environmental Statement Chapter 12 - Hydrology Land Drainage and Flood Risk [APP-221] and detailed in 7.2 Outline Code of Construction Practice (Revision C). With these measures in place, there would be no significant impacts on watercourses.
Alternatives	3.7 Failure to Pursue Appropriate Alternatives The Parish Council strongly objects to the assumption that an overhead line is the only viable solution. Given the project's magnitude and the proximity to existing infrastructure, the preference for overhead lines over underground or sub-sea cabling represents a short-term, cost-driven decision that disregards future-proofing, long-term environmental value, and	The Applicant is required to develop proposals in line with national policy and its regulatory duties. 5.15 Design Development Report [APP-122] paragraphs 2.5.5 to 2.5.11 set out the relevant context for onshore schemes which starts from the government's strong starting presumption in National Policy Statement EN-5 (2024) paragraph 2.9.20 for the use of overhead lines which form the basis of the Project, with change where justified by consideration of the mitigation hierarchy. Paragraphs 2.5.13 to 2.5.18 go on to explain why offshore technology and onshore options not including pylons are not preferred. The Applicant considers its proposals to be the appropriate means to meet the need case in the context of policy and regulatory environments

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	community impact. We assert that the national significance of the landscape demands that the most modern and least intrusive solution—undergrounding—be mandated, as is common practice in other sensitive areas internationally.	
Land and Property	4. 8. Impact on Local Communities and Infrastructure The proposed route will result in direct impacts on Tacolneston residents, including: Property Devaluation: The proximity of pylons is known to severely depress property values.	It is understandable to have concerns about property values regarding new infrastructure proposals near homes, however there is no evidence of long-term impact to property market values. Changes in overall property values can be due to several different local, regional, national factors affecting the housing market at any time. These are constantly changing. Some factors that impact house prices can be temporary or over a term. The Beaulay-Denny 2024 report was commissioned by Scottish renewables and conducted by BiGGAR Economics. The report focused on house prices along the 137 km (615 x 53m pylon) transmission route since it became operational in 2015. The study focus is mainly related to buyer preferences when faced with newly commissioned pylons and infrastructure in making offers; and examines ranges over 15 years of house price and house sale data. In summary, it demonstrates that the average house value remained consistent in the areas where the new pylons and infrastructure were constructed, and, over time, supply vs demand and the general market trends seem to dissolve any theory that pylons devalue property prices. It concludes that: • House prices in affected areas (Highland, Perth & Kinross, Stirling, Falkirk) mirrored broader market trends. Drivers such as interest rates, cost of living and supply of houses have a greater impact. In general, no significant issues have arisen in recent years because of the Beaulay-Denny power line. • Concerns are more likely to arise when a property is in very close proximity to pylons or a substation. The main concern would likely be the visual impact that affects the amenity of a property. However, individual preferences vary hugely among different

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