

Interested Party: Aldham Parish Council
Interested Party reference: [REDACTED]
Document: Deadline 8 Closing Submission
Date: 4 August 2026

CLOSING SUBMISSION: MATTERS REMAINING IN CONTENTION

1. Purpose of this submission

1.1 This submission summarises the principal matters previously raised by Aldham Parish Council during the Examination which remain unresolved at its close. It should be read alongside the Parish Council's original representation dated 18th November 2025, and the Parish Councils submissions to Deadlines 1, 5 & 6:

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN020027/documents?searchTerm=Aldham%20Parish%20Council&itemsPerPage=25>

and the supporting landscape, ecological, photographic and local evidence submitted by other Interested Parties.

1.2 Deadline 8 expressly permits Interested Parties to provide closing statements summarising matters previously raised during the Examination which have not been resolved to their satisfaction.

1.3 Aldham Parish Council recognises the national need to reinforce the electricity transmission network. However, national need does not establish that every part of the Applicant's chosen alignment, or every proposed overhead-line solution, is acceptable.

1.4 EN-1 makes clear that Critical National Priority status applies only after normal consideration of the project's impacts and application of the mitigation hierarchy. The Applicant must demonstrate that residual impacts are genuinely incapable of being avoided, reduced or mitigated. Compensation does not itself reduce the harm caused by development. ([GOV.UK](https://www.gov.uk))

1.5 In Aldham, the Applicant has not adequately applied that hierarchy. It has predominantly sought to justify the overhead route and then compensate for selected effects, rather than first avoiding the unusually concentrated combination of landscape, ecological, heritage, flooding and residential harm.

1.6 The central problem is that the Applicant has assessed the effects upon the Colne Valley, Ford Street Conservation Area, the Roman River corridor, trees and hedgerows, floodplain, birds, public rights of way and residential properties as largely separate matters. In reality, these receptors form one interconnected and highly sensitive rural landscape.

1.7 Aldham Parish Council therefore asks the Examining Authority to conclude that:

- a. the cumulative and combined harm in and around Aldham has been materially understated;
 - b. the Applicant has not demonstrated that all reasonable measures to avoid that harm have been exhausted;
 - c. localised undergrounding, material realignment or another substantially less harmful design should be required for the sensitive Colne Valley, Ford Street, Aldham and Roman River sections; and
 - d. the present overhead-line design should not be recommended for approval unless effective and enforceable changes are secured.
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2. The Colne Valley must be assessed as a single sensitive landscape

2.1 The Colne Valley is not simply a collection of unrelated views or environmental receptors. It is a coherent river-valley landscape comprising:

- the River Colne and its floodplain;
- historic settlements and the Ford Street Conservation Area;
- mature trees, hedgerows, woodland and pasture;
- listed buildings and their rural settings;
- public rights of way and recreational routes;
- wetland, grassland and woodland habitats;
- established flight lines for waterbirds; and
- the approaches to Aldham, Fordham and Ford Street.

2.2 The proposed overhead line between approximately TB046 and TB057 would cross and run alongside this landscape, with pylons appearing successively on elevated valley sides and around Ford Street and Aldham. The effect is not confined to the individual footprint of each pylon. It would transform the experience of moving through the valley and introduce a repeated industrial structure into a landscape whose character is predominantly intimate, historic, wooded and rural.

2.3 Evidence submitted during the Examination has identified the failure to assess this corridor as a whole. The constraints may be recorded separately in different Environmental Statement chapters, but the combined experience of pylons, conductors, haul roads, compounds, vegetation clearance, highway works and construction activity has not been adequately assessed as a single cumulative effect.

2.4 This matters because the significance of the Colne Valley derives from the interaction between its components. Trees and hedges screen historic settlements, frame views, connect habitats, define lanes and reinforce the valley's sense of enclosure. The floodplain supports wetland habitats and bird movements. The conservation area derives part of its

significance from its rural river-valley setting. Public rights of way connect these features and enable people to experience them.

2.5 The Applicant's compartmentalised assessment understates the true effect. A conclusion that one individual tree group, one view, one heritage asset or one bird movement is not independently significant does not answer the question of what happens when all those effects occur together in the same short section of route.

2.6 EN-1 requires consideration of long-term and cumulative adverse impacts and recognises that locally valued landscapes and policies based on landscape character assessment deserve particular attention. ([GOV.UK](https://www.gov.uk))

2.7 EN-5 also expressly provides that undergrounding may be appropriate outside nationally designated landscapes where particular route sections have a high potential for widespread and significant adverse landscape or visual effects. The policy therefore does not support any suggestion that undergrounding can only be justified within a National Landscape or National Park. ([GOV.UK](https://www.gov.uk))

2.8 Aldham Parish Council considers that the Colne Valley is precisely the type of locally exceptional and highly constrained section contemplated by EN-5 paragraph 2.9.24. The Applicant has not provided a convincing explanation as to why the accumulated environmental constraints in this valley do not justify localised undergrounding or a materially different alignment.

3. The Roman River nature recovery corridor and the Essex LNRS

3.1 The Roman River corridor is an identified strategic opportunity for habitat creation, restoration and ecological connectivity. It is not merely an aspiration advanced by the Parish Council.

3.2 Policy GN2 of the Colchester Preferred Options Draft Local Plan expressly supports the Roman River corridor nature recovery area. It states that proposals not principally related to nature recovery should demonstrate that they will not prevent nature recovery in the identified strategic opportunity areas and should explain how they will contribute to habitat creation in accordance with the Essex Local Nature Recovery Strategy.

3.3 The supporting text identifies the Roman River corridor as an opportunity for woodland, grassland, freshwater standing water and river-buffer habitats. It records that the corridor includes mature hedgerows and trees, pasture, floodplain, a reservoir, arable land and other connected habitats, and that the corridor proposal was advanced jointly by Aldham, Great Tey and Marks Tey Parish Councils. ([Colchester CMIS](#))

3.4 The Parish Council does not overstate the status of the emerging Local Plan. It is not yet adopted policy. It is, however, important current evidence of:

- a. the environmental strategy being pursued by the local planning authority;
- b. the recognised ecological importance of the corridor;
- c. the relationship between the Roman River and the published Essex LNRS; and
- d. the opportunity cost of allowing major infrastructure to fragment the corridor before nature recovery can be delivered.

3.5 EN-1 describes LNRSs as critical spatial strategies identifying the best locations to create, enhance and restore nature. It specifically links them to species recovery, habitat creation, water, flood risk, tree planting and the Nature Recovery Network. ([GOV.UK](https://www.gov.uk))

3.6 The Applicant has not shown that the proposed overhead line and its associated clearance requirements, access routes and construction disturbance would leave the Roman River corridor capable of delivering its intended “bigger, better and more joined up” ecological function.

3.7 It is not sufficient for the Applicant to point to possible planting elsewhere. The relevant question is whether the project will avoid severing or sterilising a strategically identified nature-recovery corridor and whether mitigation will maintain and improve ecological connectivity within that corridor itself.

3.8 Any recommendation should therefore require:

- a. reconsideration of the overhead-line crossing and alignment through the Roman River corridor;
- b. a corridor-wide ecological connectivity assessment rather than a series of habitat-by-habitat assessments;
- c. a secured Roman River Nature Recovery Delivery Plan aligned with the Essex LNRS and emerging Policy GN2;
- d. identified land, landowner agreement, funding and long-term management before commencement; and
- e. measurable outcomes for river buffers, hedgerows, woodland, grassland, wetland and species movement.

4. Ford Street Conservation Area

4.1 The impact upon Ford Street Conservation Area remains unresolved.

4.2 The Parish Council's Deadline 6 evidence explained that TB051 would stand approximately 120 metres east of the A1124 Ford Street Hill and approximately 200 metres from the edge of the Conservation Area. Because it would occupy higher land, the pylon would be prominent in views up the hill and out from the Conservation Area. The proposed construction laydown area was shown approximately 30 metres from the Conservation Area boundary.

4.3 TB052 would stand on still higher land on the western side of the A1124. The two pylons and their conductors would therefore be experienced on the approaches to and from the Conservation Area, rather than as remote or incidental structures.

4.4 The effect on the Conservation Area cannot properly be assessed by distance alone. Its significance is connected to:

- the river crossing;
- the historic settlement pattern;
- the enclosed rural road;
- mature roadside trees and hedges;
- views up and down Ford Street Hill;
- the transition from the river valley to open countryside; and
- the absence of comparable large-scale infrastructure.

4.5 The proposed highway and haul-road works compound the harm. The Parish Council's evidence identifies potentially substantial removal of trees, hedgerows and roadside banks to provide visibility splays on Ford Street Hill. Such works would permanently alter the historic approach to the Conservation Area even if some replacement planting were subsequently undertaken. ([NSIP Documents](#))

4.6 EN-1 confirms that Conservation Areas are designated heritage assets and requires the decision-maker to comply with the Infrastructure Planning (Decisions) Regulations 2010. It also states that elements of an asset's setting which make a positive contribution to its significance should be preserved and, where possible, better revealed. ([GOV.UK](#))

4.7 The Applicant's reliance upon future screening does not resolve the issue. Screening would:

- a. take many years to mature;
- b. be least effective during winter;
- c. not screen the conductors or upper sections of pylons;
- d. potentially obstruct valued existing views; and
- e. not restore the historic trees, banks and hedgerows removed to create access and visibility.

4.8 The proper response is avoidance. Localised undergrounding or a materially different alignment should be considered before relying upon planting to soften permanent harm.

4.9 At an absolute minimum, the construction compound should be removed from the vicinity of the Conservation Area, the route and Limits of Deviation should be tightly fixed, and no roadside tree, hedge or bank removal should be permitted without a detailed heritage and landscape design approved by the relevant planning and highways authorities.

5. Loss of trees and hedgerows

5.1 The loss of trees and hedgerows is not adequately represented by a simple count of trees removed and trees replanted.

5.2 Within the Aldham and Ford Street section, trees and hedgerows perform several simultaneous functions:

- defining the historic landscape pattern;
- screening homes and heritage assets;
- enclosing rural lanes;
- connecting woodlands, watercourses and grasslands;
- providing nesting, foraging and commuting habitat;
- slowing and storing water;
- reducing soil erosion;
- filtering views of existing development; and
- contributing to the character of public rights of way.

5.3 The Parish Council has previously identified habitat and vegetation loss around TB049 to TB051 and extensive potential clearance associated with the haul-road junctions and visibility splays. It has also identified the importance of mature trees close to Brook Road and Aldham Hall. ([NSIP Documents](#))

5.4 EN-1 states that existing trees and woodlands should be retained wherever possible. Applicants should assess the loss of all trees and woodlands, minimise adverse effects, use buffers, improve connectivity and secure the long-term management and maintenance of replacement planting. ([GOV.UK](#))

5.5 The Examination has demonstrated that the Applicant's baseline was not complete. In its Rule 17 request of 14 July 2026, the Examining Authority recorded that Aldham Parish Council had identified veteran and notable trees from the Woodland Trust Ancient Tree Inventory which did not appear on the Applicant's constraints plans, and asked the Applicant to consider updating and resubmitting them. ([NSIP Documents](#))

5.6 Any subsequent correction of the plans does not remove the underlying concern. It confirms that important arboricultural constraints were identified late in the Examination, after route selection and much of the environmental assessment had already taken place.

5.7 Nor does a commitment to replace individual trees at a ratio of 3:1 provide equivalent mitigation. Newly planted trees cannot replace, within a relevant timescale:

- the habitat value of mature or veteran trees;
- established cavities and deadwood;
- mature canopy cover;
- historic landscape structure;
- effective screening;
- flood-management functions; or
- existing ecological connectivity.

5.8 Replacement planting away from the point of loss is still less effective because it does not restore the particular landscape, screening or connectivity function lost at that location.

5.9 The Applicant has acknowledged that its opportunity plans are draft, illustrative and strategic rather than detailed designs; that they were produced within a limited timeframe; and that the schemes shown would be voluntary and dependent upon agreement with landowners.

5.10 The Parish Council submits that no material mitigation weight should be given to planting or habitat proposals unless they are:

- a. located on identified and available land;
- b. supported by landowner agreement;
- c. funded and legally secured;
- d. subject to clear delivery dates;
- e. based on local landscape and ecological objectives;
- f. managed and monitored for a sufficiently long period; and
- g. accompanied by enforceable provisions requiring replacement where planting fails.

6. The flawed nature opportunity maps

6.1 The Applicant's nature and landscape opportunity maps do not provide an adequate basis for concluding that environmental harm would be mitigated or compensated.

6.2 The maps were produced late in the Examination and have been criticised for:

- failing to show constraints clearly;
- overlooking important local environmental initiatives;

- showing broad arrows and indicative areas rather than deliverable projects;
- identifying planting on or close to existing landscape features;
- lacking detailed local and landowner consultation;
- failing adequately to reflect the Roman River nature recovery corridor; and
- providing no certainty that the land shown will be available.

6.3 These are not merely presentation issues. They go directly to deliverability.

6.4 The Applicant itself has confirmed that the maps are “draft and illustrative”, were prepared in a limited timeframe and identify strategic opportunities rather than detailed designs. It has also confirmed that schemes would depend upon voluntary landowner agreement.

6.5 An illustrative opportunity cannot be treated as secured mitigation. A financial contribution which may later be spent by another body is not equivalent to an identified, designed and enforceable scheme that addresses the particular harm caused in Aldham.

6.6 The maps also reverse the correct order of the mitigation hierarchy. The starting point should be to avoid mature habitat loss, severance and landscape harm through route and design choices. It should not be to approve those effects and then search for unspecified planting opportunities elsewhere.

6.7 The Parish Council requests that the Examining Authority gives no weight in the planning balance to the purported benefits of the opportunity maps unless each relevant proposal is translated into a precise, funded, enforceable and deliverable obligation.

7. Flooding and the proposed Ford Street works compound

7.1 Flood risk at Ford Street remains a serious unresolved matter.

7.2 Local evidence submitted to the Examination shows that the proposed compound location behind The Maltings is subject to seasonal flooding and remains waterlogged for extended periods during winter. Photographs submitted from February 2026 show actual site conditions rather than a theoretical modelled risk.

7.3 The Parish Council has also identified that the proposed haul road passes through the recognised River Colne floodplain, which is frequently flooded and performs an important flood-storage function. ([NSIP Documents](#))

7.4 A construction compound is not locationally fixed in the same way as a river crossing or other essential infrastructure. It should therefore be subject to a rigorous sequential approach, with lower-risk alternative locations examined first.

7.5 EN-1 requires flood risk from all sources to be considered, directs development towards areas of lowest risk, and requires infrastructure in flood-risk areas to be safe without

increasing flood risk elsewhere. It also requires no net loss of floodplain storage and requires flood-risk assessments to address joint and cumulative effects, duration, safe access and escape. ([GOV.UK](https://www.gov.uk))

7.6 The evidence of repeated real-world flooding cannot be dismissed merely because a compound or access lies outside a particular mapped flood-zone boundary. Flood maps do not necessarily capture local surface-water, groundwater, drainage, soil-saturation or combined flooding conditions.

7.7 Heavy construction use could:

- compact already saturated soils;
- displace floodwater;
- interrupt local drainage routes;
- increase polluted runoff and sediment;
- damage floodplain habitat;
- make safe worker and vehicle access difficult; and
- transfer flood risk to neighbouring land or property.

7.8 Aldham Parish Council's primary request is that the Ford Street compound be removed or relocated to land at demonstrably lower flood risk.

7.9 Should it remain within the Order Limits, no construction use should commence until a site-specific Flood Risk Assessment and drainage scheme have been approved. These should incorporate:

- a. the photographic and historical evidence of seasonal flooding;
- b. fluvial, surface-water, groundwater and drainage risks;
- c. climate-change allowances;
- d. flood depth, velocity and duration;
- e. safe access and emergency arrangements;
- f. pollution and sediment controls;
- g. level-for-level flood-storage compensation where required; and
- h. evidence that flood risk will not be increased elsewhere.

8. Bird collision risk along the river corridors

8.1 Bird collision risk in the Colne and Roman River corridors has not been resolved satisfactorily.

8.2 The Applicant's own Wintering and Passage Bird Report recognises that the project crosses the Roman River at Marks Tey and the River Colne near Ford Street, where there are grassland, woodland and waterbody habitats.

8.3 The Applicant has also stated that collision risk is highest where bird movements are concentrated, predictable or constrained by features such as wetlands, reservoirs and river corridors.

8.4 That description closely matches Aldham. The Colne Valley, Roman River Valley and nearby reservoir together create regular movements between water, pasture and surrounding farmland.

8.5 Local evidence records regular twice-daily movements of geese and observations of little egrets, cormorants and herons around these water features. The Parish Council and residents also observe swans, other waterbirds and birds of prey moving through and across the valley.

8.6 These observations are relevant because the issue is not simply whether a species is present somewhere within a broad survey area. The issue is whether birds repeatedly cross the proposed conductor alignment, at relevant heights and in conditions where the wires may be difficult to detect.

8.7 Larger waterbirds, including swans, geese, herons, egrets and cormorants, may have limited manoeuvrability once committed to take-off, landing or low-level movement along a river corridor. Dawn, dusk, fog, rain and other poor-visibility conditions also require consideration.

8.8 Despite recognising that watercourses, waterbodies and wetlands are locations where risk may be higher, the Applicant has proposed precautionary orange spacers and bird diverters at the River Waveney and Ardleigh Reservoir, but not equivalent mitigation for the Colne or Roman River corridors.

8.9 The Parish Council considers this inconsistent. The absence of a predicted population-level significant effect does not demonstrate that avoidable collision mortality will not occur, nor does it justify withholding reasonable precautionary mitigation from a recognised river-corridor flight path.

8.10 EN-5 recognises the use of bird diverters as potential mitigation and requires mitigation to be species-, line- and site-specific. ([GOV.UK](https://www.gov.uk))

8.11 The Examining Authority is requested to require:

a. a specific assessment of flight lines across the Colne and Roman River sections, including movements between the rivers, reservoir, pasture and arable feeding areas;

- b. appropriate seasonal, dawn and dusk survey coverage;
- c. identification of the spans most likely to intersect regular bird movements;
- d. installation of suitable bird-flight diverters or other marking on all relevant spans;
- e. post-construction collision monitoring by an appropriately qualified independent ecologist;
- f. reporting to the local planning authority and relevant nature-conservation bodies; and
- g. an enforceable adaptive-management mechanism requiring further mitigation where collisions are recorded.

8.12 Bird diverters reduce risk but do not eliminate it. Localised undergrounding remains the only design option which would remove overhead-line collision risk from the affected section entirely. That benefit should form part of the comparison required by EN-5.

9. Proximity of pylons to Aldham housing

9.1 The proximity of the proposed overhead line to homes in Aldham remains unacceptable and inadequately mitigated.

9.2 The Parish Council's Deadline 6 evidence records that:

- TB055 would be approximately 140 metres from the rear of the nearest homes on the southern side of Hines Close;
- the haul road near Green Lane would be less than approximately 90 metres from the nearest property;
- TB057 would be approximately 100 metres from Brick Cottages; and
- homes would experience both permanent visual effects and prolonged construction noise and disturbance. ([NSIP Documents](#))

9.3 These are not isolated rural properties. Hines Close and the roads around Aldham Church form one of the principal concentrations of housing in the parish.

9.4 The Applicant's revised landscape and visual assessment accepts that movement within the Limits of Deviation could bring the overhead line closer to Hines Close, increase the number of visible pylons and increase the magnitude of change.

9.5 Colchester City Council has concluded that the extreme Limits of Deviation visualisation for Hines Close is "very materially worse" and demonstrates why the Limits of Deviation should be restricted to their absolute workable extent.

9.6 During Issue Specific Hearing 4, the Examining Authority specifically asked whether a restriction should prevent movement eastwards towards Hines Close. The Applicant's subsequent answer was that the visualisation would not change the conclusions of its assessment. It did not offer the requested restriction.

9.7 That is not a satisfactory answer. A conclusion that an effect remains within the same significance category does not mean that a materially worse design is acceptable. Where flexibility is capable of moving a pylon closer to homes or increasing the number of pylons visible, it should be removed unless genuinely necessary.

9.8 The Residential Visual Amenity Assessment threshold is not a safe harbour below which substantial visual harm can be disregarded. Even where an effect does not cross the exceptional RVAA threshold, it remains a material landscape, visual and residential-amenity consideration.

9.9 Landscaping is not an adequate substitute for separation. Screening would take years to establish, would be less effective in winter and could itself remove valued open views from residents.

9.10 The Parish Council requests:

- a. a binding restriction preventing TB055 and associated conductors from moving eastwards towards Hines Close;
- b. the narrowest technically workable horizontal and vertical Limits of Deviation throughout Aldham;
- c. prioritising of pylons and haul roads away from homes;
- d. retention of existing vegetation between the project and residential properties;
- e. detailed construction noise, dust, lighting and traffic controls specifically addressing Hines Close, Green Lane, Brook Road and Brick Cottages; and
- f. meaningful local consultation on final siting before the relevant requirements are discharged.

10. Overall conclusion and requested recommendation

10.1 Aldham Parish Council submits that the Applicant's evidence does not demonstrate that the effects within Aldham are unavoidable residual effects arising after proper application of the mitigation hierarchy.

10.2 The unresolved harm arises from the concentration of the following features in a relatively short section of route:

- a highly valued river-valley landscape;
- the Ford Street Conservation Area and other heritage assets;
- the Colne and Roman River ecological corridors;
- an identified LNRS and nature-recovery opportunity;
- mature and veteran trees and historic hedgerows;
- floodplain and seasonally flooded land;
- regular waterbird and raptor movements;
- public rights of way; and
- established residential areas in close proximity to the proposed pylons.

10.3 Considered together, these constraints make the Aldham section materially different from ordinary open agricultural land. The Applicant's reliance upon separate assessments, illustrative opportunity maps, future planting and post-consent detail does not amount to a convincing demonstration that avoidance has been exhausted.

10.4 EN-5 provides the policy basis for recommending undergrounding on individual sections outside nationally designated landscapes where significant and widespread landscape and visual harm is likely. The Colne Valley, Ford Street, Aldham and Roman River corridor should be treated as such a section. ([GOV.UK](https://www.gov.uk))

10.5 Aldham Parish Council therefore respectfully asks the Examining Authority to recommend that the present overhead-line solution through this sensitive corridor should not be authorised unless the Applicant first provides a materially less harmful solution.

10.6 The Parish Council's preferred outcome is:

localised undergrounding or a materially less harmful realignment through the Colne Valley, Ford Street, Aldham and Roman River sections, with transition points selected through a transparent environmental and engineering assessment.

10.7 Should the Examining Authority nevertheless be minded to recommend the overhead alignment, the Parish Council asks that the DCO and associated certified documents secure, as a minimum:

1. tightly restricted Limits of Deviation, including an express prohibition on movement towards Hines Close;
2. removal or relocation of the Ford Street construction compound to land at lower flood risk;
3. a site-specific Flood Risk Assessment incorporating observed and historical flooding before any works commence;
4. an updated and verified schedule of veteran, notable and mature trees and hedgerows, with appropriate root-protection and ecological buffers;
5. avoidance of tree and hedge removal wherever technically possible and long-term, locally appropriate replacement where loss is unavoidable;
6. no reliance upon nature or landscape opportunity maps unless the relevant proposals are fully designed, funded, agreed with landowners and legally secured;

7. a Roman River Nature Recovery Delivery Plan aligned with the Essex LNRS and emerging Local Plan Policy GN2;
8. a detailed heritage and landscape scheme for Ford Street Conservation Area and its approaches;
9. span-specific bird-collision mitigation for the Colne and Roman River corridors, with independent monitoring and adaptive management;
10. specific construction protections for Hines Close, Green Lane, Brook Road, Brick Cottages and other affected Aldham residents; and
11. independent monitoring, transparent reporting and enforceable remedial action where environmental mitigation fails.

10.8 Unless these matters are resolved, the residual adverse effects within Aldham should be given substantial weight against the present design in the planning balance.

Signed:



Chair

For and on behalf of Aldham Parish Council