

Deadline 8 Submission to the Examining Authority

Norwich to Tilbury Electricity Transmission Project

Submitted by: Suzanne Bolwell-Davies - [REDACTED]

Dear Members of the Examining Authority,

I am writing to make a further personal submission at Deadline 8 regarding The Applicant's Norwich to Tilbury Electricity Transmission Project.

Having lived with this proposal for over four years, attended numerous hearings, reviewed extensive documentation, and submitted evidence throughout the examination process, I remain seriously concerned by the significant environmental, health, heritage and community impacts of this scheme. I also have profound concerns regarding the Applicant's approach to consultation, evidence gathering, project development and public engagement.

In my view, the proposed overhead line has not been demonstrated to be the best solution, and The Applicant has failed to adequately consider alternatives that could substantially reduce many of the harms identified throughout this examination.

1. Trees and Woodland Loss

One of my greatest concerns is the extensive loss of trees and vegetation, particularly within the DOL and other areas along the route. The approach appears, in many locations, to resemble a "scorched earth" clearance strategy rather than one focused on retention and protection.

Trees provide essential ecological, landscape and climate benefits. They store carbon, provide habitat for wildlife, offer shade during extreme weather and help reduce flood risk. Every effort should be made to protect mature trees and minimise losses.

I am also concerned that the Applicant has not adequately demonstrated how the principles of the Treasury Green Book have been applied when considering alternatives. Proper application of Green Book principles would require consideration of wider environmental, ecological and societal costs and benefits. In my view, this would lead to solutions that result in significantly less loss of woodland and mature trees than the current proposal.

2. Climate Change, Drought and Extreme Heat

As of 4th August 2026, we are experiencing the fourth heatwave of the year. Climate scientists continue to warn that more frequent droughts, extreme heat events and severe weather conditions are becoming the norm.

Despite this, the Applicant provides very limited evidence demonstrating how this pylon line is being future-proofed against the climate conditions that are expected throughout its operational lifetime.

This is particularly concerning given that the infrastructure is expected to remain in place for many decades. The Applicant has not adequately explained how the scheme will perform during prolonged droughts, extreme temperatures, increased wildfire risk, more intense storms or changing flooding patterns.

3. Water Usage During Construction

The region is currently subject to a hosepipe ban to protect essential water supplies. The Applicant proposes substantial construction activities that will inevitably create significant quantities of dust.

The Applicant has not satisfactorily explained where the water required for dust suppression will come from during periods of water shortage.

If bowzers are used to transport water around the construction route, this creates a number of additional impacts:

- Increased construction traffic on rural roads.
- Increased vehicle emissions.
- Additional noise from vehicle movements.
- Additional dust generated by construction traffic.
- Additional pressure on already stressed water resources.

The Applicant has failed to demonstrate how these cumulative effects will be managed or mitigated.

4. Wildfire Risk and Infrastructure Resilience

The route passes through rural landscapes that are increasingly vulnerable to wildfire due to prolonged periods of drought and extreme heat.

As reported nationally during summer 2026, more than 700 wildfires had already occurred by early August. Fields throughout Essex and East Anglia are extremely dry and vulnerable to ignition.

I am concerned that insufficient consideration has been given to:

- The potential for electrical infrastructure to contribute to wildfire ignition.
- The potential for wildfires to damage transmission infrastructure.
- The increased wildfire risks associated with climate change.

The Applicant has not provided sufficient evidence demonstrating how the pylon route has been future-proofed against extreme weather events or wildfire conditions expected over the coming decades.

Instead, the responsibility appears to be placed largely on landowners and emergency services to manage these risks. I do not consider this to be an appropriate or responsible approach for nationally significant infrastructure.

5. The Reverse Threat: Wildfires Damaging the Grid

Public discussion often focuses on the impact of infrastructure on the environment. However, there is another issue that deserves consideration: the impact of environmental change on the infrastructure itself.

Wildfires can threaten transmission assets and increase resilience risks. It is therefore important to consider whether the proposed design is genuinely future proofed for the climate conditions anticipated over coming decades. I have seen no evidence from the Applicant of future proofing the grid.

6. Drought, Ground Conditions and Flooding

Recent events in parts of Europe have demonstrated how drought can be followed by extreme rainfall events with devastating consequences as in Valencia, Spain.

Extended dry periods can leave soils hardened and compacted, reducing their ability to absorb rainfall. This raises concerns regarding increased flooding along parts of the route.

Given the changing climate and more frequent weather extremes, flooding impacts require far more robust consideration, which the Applicant has failed to do.

7. Why Are Safer Alternatives Not Being Fully Pursued?

Given increasing wildfire and climate risks, I struggle to understand why The Applicant continues to pursue an extensive overhead line solution instead of properly examining alternatives that would reduce risk to people, wildlife and the environment.

Undergrounding infrastructure would significantly reduce visual impacts and could mitigate many concerns relating to fire, bird collisions and landscape harm.

At a time when society imposes restrictions on activities that may create sparks during periods of extreme fire risk, it seems contradictory that major overhead infrastructure is being promoted through vulnerable rural landscapes.

8. The Applicant's Approach to Bird Mortality, Farmland birds and Red listed birds

The risk of bird collisions with overhead transmission infrastructure remains a major concern particularly as the Applicant appears to accept a level of bird collision mortality as unavoidable.

This approach is unacceptable where alternatives may exist to avoid harm in the first place. Furthermore, concerns have been raised regarding the application of relevant guidance and best practice.

Large and vulnerable bird species are affected for example: Geese, Swans, and Raptors like Red Kites, Buzzards to name a few who regularly fly over the proposed pylon line. The Applicant must demonstrate that all risks have been properly assessed and that the latest evidence has been applied consistently throughout the route. Yet the Applicant has only agreed to mitigation in 2 places along the Pylon route, which shows a complete contempt for the birds that we have around us and play such an important part of our existence.

I disagree with the Applicant's conclusion that there will be minimal impacts on Farmland birds, Red List species and bird collisions of such birds.

Bird populations are already under significant pressure due to habitat loss and climate change. The Norwich to Tilbury proposal would introduce approximately 114 miles of overhead transmission infrastructure across rural landscapes that currently support many bird species. For example, Barn owls are an iconic species of the rural landscape and rely on open farmland and connected habitats, they will suffer considerably from the proposed pylon route with additional loss of trees, woodlands and habitat and disruption to the open farmland that they rely heavily on. Likewise, Farmland birds, that the Applicant fails to believe exist are in grave danger of further decline (most already on the red list) to the point of extinction for example the Skylark, that flies high to ward off predators away from their nests is likely to be caught in the low sag of the overhead lines. Destruction of farmland, hedgerows, trees and habitat will play a huge part in the decline in populations of farmland birds along the whole of the 114 mile Norwich to Tilbury Pylon route.

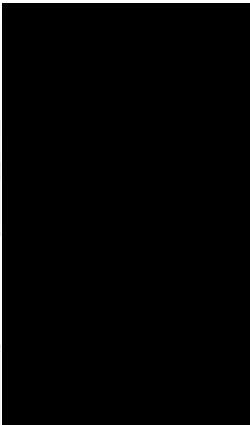
I remain concerned about potential impacts on barn owl and farmland bird populations and believe that detailed ecological assessment should continue to be undertaken using appropriate field-based surveys rather than relying heavily on desk-based methodologies.

The cumulative effect of pylons and conductors across such a large distance should not be underestimated.

In my view, the project will create a substantial barrier through the countryside and increase risks for many species already experiencing long-term decline.

Furthermore, I remain concerned that the Applicant appears willing to accept some level of bird mortality as inevitable. The purpose of planning and environmental protection should be to avoid harm wherever possible rather than simply accepting it as collateral damage.

Last Year we had a special visitor who flew in from Iceland, a Whooper Swan, a young Juvenile who has now become a celebrity called Bjork. He was quite friendly and happy swimming with the other Mute Swans in Central Park Chelmsford when I Photographed him. To make his trip home to Iceland he will have to fly over the proposed Norwich to Tilbury pylon line with potential disastrous consequences, either killed or painfully maimed, which is just so incredibly sad and to be honest shameful.

 Whooper Swan (<i>Cygnus cygnus</i>) Research Grade 4		Dec 19, 2025 2:58 PM GMT	📍 Parkway, Chelmsford, England, GB	Dec 19, 2025 6:03 PM GMT
 Black-headed Gull (<i>Chroicocephalus ridibundus</i>) Research Grade 4		Dec 19, 2025 2:59 PM GMT	📍 Essex, England, GB	Dec 19, 2025 5:47 PM GMT
 Whooper Swan (<i>Cygnus cygnus</i>) Research Grade 6		Dec 19, 2025 2:59 PM GMT	📍 Essex, England, GB	Dec 19, 2025 5:46 PM GMT
 Whooper Swan (<i>Cygnus cygnus</i>) Research Grade 5		Dec 19, 2025 2:59 PM GMT	📍 Essex, England, GB	Dec 19, 2025 5:46 PM GMT

9. Bats

Bats matter across the UK and around the world. Bat species play a vital role in ecosystems, from agricultural land to tropical forests. They pollinate plants, disperse seeds and eat insects which damage crops. Bats matter to science too, by monitoring their populations this tells us a lot about biodiversity and the health of our landscapes, which is critical for understanding the change in our climate. We need bats because they control pest populations, pollinate plants, and disperse seeds. Without them, ecosystems and food production would face massive disruptions.

I am very concerned that the Applicant is using technology-based desk assessments and relying on them for evidence of Bats or not in most cases, where direct ecological survey work should be undertaken.

Bats are protected species and deserve robust assessment using appropriate field methodologies and they are prolific along the pylon route. The Applicant has failed to do this.

10. Mental Health Impacts

I completed the Mental Health Survey undertaken by Pylons East Anglia and was incredibly disappointed to learn that the Applicant appears not to have substantively

responded to the findings. This is particularly concerning given the stress, uncertainty and anxiety experienced by many residents living with this project over a prolonged period.

Ignoring or minimising the psychological impacts on communities demonstrates a failure to genuinely engage with those affected.

11. Complete Loss of Trust and Confidence

After four years of engagement from myself with the Applicant, I must say it has been one-sided, I have unfortunately lost confidence in the Applicant's ability to deliver this project responsibly.

Having attended numerous hearings, I have repeatedly witnessed:

- Poor responses to questions, if any.
- Reliance on outdated or inaccurate documentation.
- Failure to provide clear evidence.
- Repeated references to documents rather than direct answers.
- A tendency to create complexity rather than clarity.

This has significantly undermined my trust and others involved in the process. The Applicant has on numerous occasions demonstrated that it is not fit to manage a project of this size and complexity.

12. Noise, Protected Characteristics and Independent Monitoring

I remain deeply concerned about the cumulative effects of construction noise and operational noise on nearby communities. Noise is a specialist area, and we are reliant on the Applicant to be honest with the noise levels including the cumulative noise levels of the construction works. As mentioned previously I have no trust in the Applicant, who will no doubt subcontract the works. Therefore, to provide proper protection for residents, I request that independent noise monitoring be required and laid out in the DCO at locations where the route passes close to homes, villages and communities.

Such monitoring should not be under the control of the Applicant and should continue throughout construction and operation where appropriate.

I am especially concerned by the apparent lack of mitigation for those with protected characteristics under the Equality Act.

In particular:

- Children with autism and sensory sensitivities may be disproportionately affected by construction and operational noise.
- Individuals with disabilities may experience greater impacts from disruption and environmental stress.
- Vulnerable residents may be less able to escape noise and disturbance.
- Listed above are some of the most vulnerable members of society who may experience disproportionate impacts from the construction activity, exhibit stress, disruption, noise and reduced access to services.

I have been unable to identify any meaningful mitigation within the application which specifically addresses these groups. This appears to be a significant omission.

13. Dust and Health Impacts

Current drought conditions clearly demonstrate how dusty agricultural land becomes during prolonged dry weather.

Construction activities are likely to generate substantial dust, creating impacts on:

- Local residents
- Property and gardens
- Schools
- Vulnerable individuals
- Asthma sufferers
- People with respiratory disease

These concerns should not be underestimated by the Applicant, and I can find no meaningful mitigation to support these groups.

14. Flooding and Climate Resilience

Recent international events have demonstrated the relationship between prolonged drought, soil compaction and subsequent flooding when intense rainfall occurs.

The Applicant has not adequately demonstrated how flood risks will be managed throughout the route. Nor has it shown clear agreement with all relevant water authorities regarding flood mitigation measures.

Given the increasing frequency of extreme weather events, this omission is particularly concerning.

Infrastructure intended to operate for many decades must be designed for future climatic conditions rather than historic assumptions.

15. Archaeology and Heritage

The route passes through one of the most historically significant landscapes in Britain.

The areas around Colchester, Chelmsford, Writtle and Ingatestone contain extensive evidence of Roman and Iron Age occupation, including settlements, villas, temples, other archaeological remains as well as many locations for example Roman's Road, Roman's Place, Roman's Way, all giving historical clues to their origins.

This should not come as a surprise. These sites have been known about for generations and form part of our shared national heritage.

The discovery of additional remains during surveys demonstrates the archaeological sensitivity of the route corridor. Furthermore, prolonged summer droughts increasingly reveal buried archaeological features through crop marks visible from the air. It will be interesting to see what new remains are identifiable along the pylon route.

I am particularly concerned that infrastructure elements have been proposed in locations associated with known archaeological interest. This is frankly appalling.

Below is one example of a known Roman site at Great Horkesley, that the Applicant's own geophysical survey and trial trenching confirmed a substantial Romano-British enclosure complex incorporating a possible building, industrial activity and a cremation. As you can see this is within the CSE Compound.



The Applicant has been informed of this Romano-British Site for the last 4 years and yet has chosen to ignore its existence until surprise, the site exists! Not only that it is a site of great national importance, but all can also be avoided and protected if the Applicant had pursued alternatives to AC Overhead lines and AC Undergrounding. Once damaged, this heritage cannot be replaced.

16. Need Case and Delivery Timescales

I note the conclusions within the Hiorns Report, which indicate that evidence has not been provided demonstrating that Norwich to Tilbury must be delivered by 2030 or 2031?

This calls into question the urgency that has been used to justify aspects of the project.

17. Environmental Commitments

The Government has established environmental objectives through legislation and policy, including commitments to improve biodiversity and environmental outcomes.

It is difficult to reconcile those objectives with a project such as Norwich 2 Tilbury that would result in significant and lasting environmental harm across large areas of countryside.

18. Loss of Productive Farmland and Food Security

The route affects productive agricultural land at a time when farmers are already facing unprecedented pressures from drought, extreme weather, wildfires and declining yields.

Food security is becoming an increasingly important national issue. The loss and disruption of valuable farmland should therefore be given significant weight. This is a major consideration as the Applicant has not taken into account the many viable alternatives that are available and appears to be steadfast in pursuing the Project that will cause the most harm to farmland and food security, as well as other major factors for example health, recreation, business, environment etc.

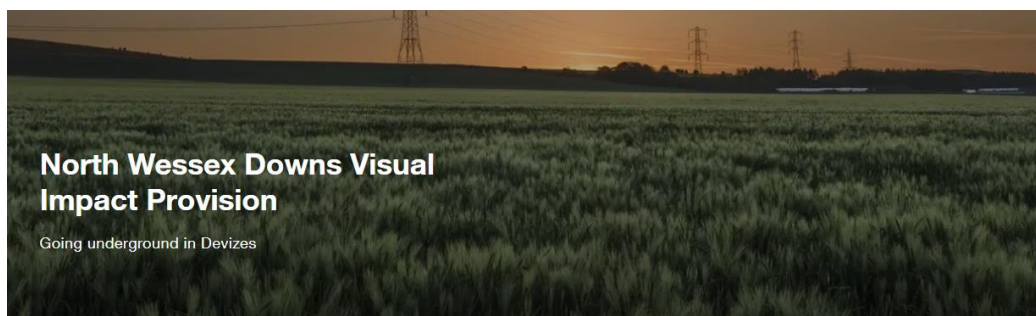
19. Failure to Consider Genuine Alternatives

After four years of consultation, it remains my view that the Applicant selected a route and then sought to justify it, rather than objectively evaluating all available alternatives.

The project appears heavily focused on an overhead AC solution and AC undergrounding despite the availability of other newer technologies and approaches, for example: Offshore routing using HVDC; HVDC Undergrounding the whole route; using existing infrastructure like Bradwell which already has existing provision for pylons; TS Conductors and other methods of improving the existing lines, generating additional energy due to reduced sag etc.

I am particularly concerned that the Applicant has dismissed or failed to adequately engage with alternative proposals and expert reports submitted during consultation and Planning Process. This includes landscape-based route assessments by the NW SW Parishes Group and concerns previously raised regarding adherence to established routing principles.

The situation is made all the more frustrating by the Applicant's own public statements elsewhere promoting innovation and the removal or undergrounding of infrastructure where landscape and environmental impacts justify it. For example, the Devizes Pylon line over an ANOB in Wiltshire is in the process of being underground and should be completed by the end of 2026.



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The Visual Impact Provision (VIP) project in the North Wessex Downs National Landscape (formerly AONB) will reduce the visual impact of National Grid's overhead line to the north of the market town of Devizes.

We're continuing to make significant progress on site and are currently in the process of preparing the new underground cables to be connected and energised. Take a look at our video filmed in summer 2025 to see the construction work taking place:



National Grid is replacing 4.6km of overhead electricity line and 13 pylons with underground cable in the North Wessex Downs National Landscape.

This major engineering project involves a once-in-a-generation opportunity to transform the skyline in Devizes, including spectacular views from the Millennium White Horse.

The Norwich 2 Tilbury route which goes through the countryside that was immortalised by John Constable and other painters, the Big Skies, the Colne and Stour Valleys and the beautiful open farmland around our historic villages deserve the same consideration.

Likewise, many of the concerns raised throughout this examination process could be immediately reduced or eliminated through alternative approaches.

This includes impacts relating to:

- Health
- Mental Health
- Dust
- Noise
- Wildfire risk
- Flooding
- Heritage
- Biodiversity
- Trees
- Wildlife
- Businesses
- Livelihoods
- Landscape

I therefore question why these alternatives were not properly assessed before submission of the Development Consent Order for examination by the Applicant?

20. The £30 Million Community Fund

I do not view the proposed £30 million community fund as an adequate response to the impacts that communities will experience. The figure is far too small; in fact, you cannot put a price on the devastation of the Norwich 2 Tilbury Pylon line.

Rather than compensating communities after harm has been created, I believe greater effort should be directed towards identifying solutions that avoid or significantly reduce that harm in the first place.

21. Overall Conclusion

After four years with this project, 6 months with the examination of this project, my concerns have only increased. The Applicant has failed to demonstrate that this proposal is appropriately future proofed against climate change, extreme weather, flooding, drought or wildfire risk. It has failed to adequately address the impacts on trees, wildlife, birds, archaeology, farmland, health and local communities. It has also failed to demonstrate that less harmful alternatives have been genuinely and objectively considered.

The Norwich to Tilbury proposal is based upon technology whose design principles date back more than a century, yet it is being promoted as a solution for the challenges of the next century. I do not believe the Applicant has demonstrated that this project is fit for purpose, resilient, future-proofed, environmentally responsible or in the public interest.

For these reasons, I respectfully ask the Examining Authority to give significant weight to the unresolved concerns raised throughout this examination and to carefully consider whether alternative solutions would better serve both consumers and future generations while protecting communities, heritage, wildlife and the environment. Thank you for your consideration.

Suzanne Bolwell-Davies

Interested Party - [REDACTED]

Norwich to Tilbury Examination

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