Final Submission – Norwich to Tilbury Pylons Development Consent Order

I have attended many of the Issue Specific Hearings. However, as a [redacted] rather than a professional involved in the planning or heritage sectors, I have found it challenging to read and interpret the large volume of technical documentation associated with this application. Despite raising a number of concerns throughout the examination, I do not believe that National Grid has provided satisfactory responses to many of the issues I have raised. The pylons that I am specifically concerned with are TB133-144.

One of my main concerns relates to National Grid's reliance on a desk-based assessment to evaluate the effects of the proposed pylon route on Langleys, a Grade I listed house, and its associated Grade II Registered Park and Garden. National Grid states that this assessment was undertaken in accordance with "standard archaeological and heritage practice", yet no reference is provided to identify the specific standards or guidance relied upon. Historic England states that *"Grade I buildings are of exceptional interest; only around 2.5% of listed buildings are Grade I."* Given the exceptional significance of both the building and its historic landscape, I question whether a desk-based assessment alone can provide an adequate evidence base for assessing the likely effects of infrastructure of this scale. It is difficult to understand how the full impact on the setting of such an important heritage asset could be properly assessed without a detailed site visit.

The limitations of the desk-based assessment are illustrated by its conclusion that Langleys and the garden are protected by some screening by mature vegetation and buildings. In reality, much of this "screening" for TB 137 and TB140 possibly TB139 and TB 141 (the definitive map keeps changing so the exact position is difficult to calculate) consisted of a commercial crop of Cricket Bat Willows, and which are periodically felled and therefore cannot reasonably be regarded as permanent landscape screening. This demonstrates that the assessment failed to identify an important feature on the ground and therefore raises wider concerns regarding the reliability of its conclusions. NG have acknowledged the cricket bat willows in their final submission but no extra mitigation has

been granted to compensate for the lack of screening. I attach four photos from the top floor of Langleys to illustrate the views over the park and gardens that will be permanently negatively affected by the proposed pylons.

Nevertheless, National Grid concludes in its assessment of Operational (and Maintenance) Effects that: "The value of Langleys is high, and the magnitude of impact prior to mitigation is considered to be low adverse. Therefore, there is likely to be a direct, permanent minor adverse significance of effect (not significant)." In my view, this conclusion substantially understates the effect of introducing large lattice pylons into the setting of a Grade I listed building and its registered historic landscape. The favourable conclusions reached through the desk-based assessment appear to have enabled National Grid to retain its preferred route through the Waltham Gap, rather than giving proper consideration to alternative alignments to the north-west of the village or the use of underground HVDC cables.

To give some perspective of the damage these pylons will have just in the Chelmsford area, National Grid's own Environmental Statement (Volume 6: Environmental Statement, Document 6.11.A2 – Historic Environment Baseline Report, Section F) acknowledges that the project would affect:

- one high-value Scheduled Monument (Settlement Site at Ash Tree Corner – 1002140);
- one high-value Grade I listed building (Langleys – 1305533);
- three high-value Grade II* listed buildings;
- sixty-seven Grade II listed buildings;
- the conservation areas of Great Waltham and Little Waltham; and
- the Registered Park and Garden at Langleys (100241).

National Grid also acknowledges that it previously identified an alternative route to the west of the Walthams, as described in Section 9.2 of the Design Development Report (APP-122), but dismisses this option on the basis that “alternatives are not devoid of their own effects”. This does not adequately address the issue. Any route for a project of this nature will inevitably have impacts. The relevant question is not whether alternative routes have effects, but whether those effects would be less harmful overall. Specifically, would an alternative route affect fewer homes, fewer designated heritage assets and less historically significant landscape than

the current proposal through the Waltham Gap? In my opinion, this comparative assessment has not been adequately demonstrated.

I am also concerned that T-pylons have largely been dismissed because of their higher capital cost, despite National Grid acknowledging that they offer benefits through reduced visual impact and a smaller land take. If Ofgem requires National Grid to adopt the lowest-cost acceptable design, it is important to understand how "acceptable" has been defined. Cost should not be considered in isolation where nationally significant heritage assets are concerned. Furthermore, I understood that National Grid is expected to apply the Holford Rules when developing overhead line routes. Holford Rule 1 requires the investigation of alternative routes to avoid environmental and landscape impacts wherever possible. Rule 2 emphasises the protection of the setting of important landscape and heritage features where avoidance cannot be achieved. Both underground HVDC cables and T-pylons would substantially reduce the visual impact on the setting of Langleys when compared with the proposed lattice pylons. I do not believe the evidence presented demonstrates that these alternatives have been given sufficient weight in accordance with those principles.

For these reasons, I remain concerned that the assessment of heritage impacts in the Waltham area has not been sufficiently robust, that reasonable alternatives have not been fully evaluated and that the proposed route through the Waltham Gap does not represent the option that would cause the least harm to nationally important heritage assets.