

Summary of Deadline 8 Closing Submission

Karl Owen, [REDACTED] — Registered IP Reference

This closing statement summarises outstanding matters concerning my [REDACTED] who has protected characteristics under the Equality Act 2010, and the rest of my household at [REDACTED] in response to the Applicant's response to my Deadline 6 submission (REP6-213).

- [REDACTED] legal rights only entered this examination because I discovered them by chance, attending an Open Hearing as an observer — not through anything National Grid did, despite [REDACTED] having known of [REDACTED] circumstances since 2024.
- Only two meetings with the Applicant have ever taken place in two years, both instigated by me. A promised site visit was cancelled on 7 July 2026 and not rescheduled for a month; a visit is now proposed for dates falling after Deadline 8, and in two of three cases after the examination closes.
- Five Holford Rules breaches, acknowledged in person by [REDACTED], remain unanswered by the Applicant. Unlike breaches elsewhere on the route, no competing rule was preserved in exchange at this property.
- No equality impact assessment specific to [REDACTED] has ever been produced, despite two years passing since [REDACTED] was told of [REDACTED]. The Applicant's own statements on the nearest pylon's post-realignment distance are mutually inconsistent.
- The Applicant's noise and visual assessments do not reflect this property's specific reality — including reduced barrier effectiveness, an acoustic-tunnel driveway, and two household members' sensitivity to persistent low-level sound rather than loudness.
- The annexe proposed for [REDACTED] and a wider non-monetary mitigation package, remain requested. Those who know our circumstances directly — a local councillor, a parish councillor, and my MP — have all indicated support, contrary to the Applicant's suggestion that funding it would be unfair to bill payers.

I ask the Examining Authority to require the Applicant to answer specific outstanding questions on the record, and to take the annexe and mitigation package into account in its recommendation to the Secretary of State. Full detail and evidence is set out in the accompanying closing statement.

Note on the use of AI: AI (Anthropic's Claude) was used to assist in drafting this summary and the accompanying closing statement, based on facts, evidence, and instructions provided by me. All factual content, arguments, and positions taken are my own.

Norwich to Tilbury Development Consent Order Examination

Deadline 8 Closing Submission

Summary of outstanding matters, in response to the Applicant's response to my Deadline 6 submission (REP6-213)

Submitted by:

Karl Owen, Interested Party / Affected Party, Registered IP [REDACTED]

Property:

[REDACTED]

Examination Deadline:

Deadline 8 — 4 August 2026

1. Introduction and Purpose of This Closing Statement

This is a closing statement, not a repetition of the case set out in my Deadline 6 submission (8 June 2026) and my supplementary representations of June 2026, all of which remain on the examination record. Its purpose is to summarise where matters now stand, set out what has changed since Deadline 6, and identify what I ask the Examining Authority ("the ExA") to weigh before the examination closes on 10 August 2026.

Everything here serves one aim: securing reasonable, proportionate protection for my [REDACTED], who has protected characteristics under the Equality Act 2010, and for the rest of this household, from the sight and sound impacts of this project on a home that has, until now, been whisper-quiet open countryside. That aim is why I sought meetings with [REDACTED] in the first place, and why I have continued through this process.

The ExA has already received, in confidence, material documenting the seriousness of [REDACTED] history. I do not repeat that material here. I ask instead that this closing statement be read alongside it — not as a separate case to be judged on its own, but as the practical question that follows from what is already known: what can still be done, by those with the power to do it, in the time that remains.

2. How [REDACTED] Legal Rights Actually Entered This Examination

I want the ExA to understand plainly how the question of [REDACTED] protected characteristics came to be part of this examination, because it was not through anything National Grid did. I have no legal training. I first heard the phrase "protected characteristics" while attending an Open Hearing as an observer, listening to the ExA discuss a case in Essex that sounded very similar to [REDACTED] circumstances. That is when I first understood that [REDACTED] had specific legal rights under the Equality Act 2010.

[REDACTED] already knew that phrase. When he visited [REDACTED] in May 2024 and I told him of [REDACTED] he recognised what he was being told in terms of protected characteristics. He did not tell me [REDACTED] had legal rights. No equality impact assessment specific to [REDACTED] followed. Had I not happened to attend that Open Hearing, I do not believe this examination, or National Grid, would ever have grappled with [REDACTED] circumstances at all. I ask the ExA to weigh this

when assessing how seriously the Applicant's professed "understanding" of its obligations should be taken.

3. Only Two Meetings Have Ever Taken Place

The Applicant's response to my Deadline 6 submission refers to "targeted engagement at this property" in a way that implies an ongoing pattern of meetings and correspondence. This is not accurate. In two years, there have been exactly two meetings with the Applicant, and I set out the sequence precisely because it matters.

Approximately one week before the first meeting, I attended a Mendlesham parish meeting at which Councillor ██████ told over a hundred attendees that National Grid was struggling to route safely around the Bacton high pressure gas pipeline and the existing lower-voltage lines to the west of the parish, and that ██████ sat directly in the middle of that difficulty. During the audience question session I took the microphone to say that I lived there, that I did not understand why undergrounding was not being used, and that I was genuinely worried. Afterwards I approached Councillor ██████ directly; he told me that Project Leader ██████ was coming to meet a neighbouring farmer, ██████, within days, to try to move the lines and haul road to the edge of ██████ field, and that he would try to arrange for me to see ██████ after that meeting. That first meeting with the Applicant, in other words, was arranged for ██████ benefit; my own meeting was a secondary add-on I only received because Councillor ██████ intervened on my behalf, not because the Applicant sought me out.

The second meeting, at Chelmsford on 23 June 2026, followed months of my own repeated requests once I understood that ██████ legal rights had been known to the Applicant and not acted upon. I heard nothing substantive back for months, to the point that I was, in effect, begging the ExA for a meeting with the Applicant. Only a few days before Open Hearing 4 did the ExA confirm that the Applicant was finally prepared to meet me there. That meeting lasted just over an hour, and centred on ██████ and my family's circumstances and my fears for them. During it, ██████ and ██████ looked briefly through part of ██████ medical file before closing it, remarking on how personal the information was. I do not say this to criticise their reaction, which was human and understandable, but I ask the ExA to note that a brief skim of a file, closed after acknowledging its sensitivity, is not the detailed engagement with ██████ needs that could substitute for the site visit both of them agreed was still necessary afterwards. Both meetings, then, were instigated by me — the first only by chance, through Councillor ██████ intervention, and the second only after months of requests channelled through the ExA — not by any proactive engagement from the Applicant.

A further site visit was then arranged for 7 July 2026, promised by ██████ as the necessary next step following the disclosure of ██████ medical file. It was cancelled by telephone at approximately 10:03am that morning, logged on my phone, after ██████ colleague had a puncture en route. I offered to wait, however long it took, for the visit to proceed later the same day; this was declined, as the Applicant's team had other commitments that afternoon. No visit was arranged for a further month. A visit is now proposed for 6 August, 26 August, or 27 August — the earliest of which falls two days after this Deadline 8, and the other two after the examination closes altogether. I ask the ExA to treat this history, not the Applicant's characterisation of it, as the accurate record of the level of engagement in this case.

4. Holford Rules — Status Unchanged

My Deadline 6 submission set out five breaches of the Holford Rules (Rules 2, 4, 5, 6 and 7), acknowledged in person by [REDACTED] in the presence of Councillor [REDACTED] who witnessed the acknowledgement at close range. The Applicant's response has not withdrawn or qualified that acknowledgement. I ask the ExA to require the Applicant to confirm, before the examination closes, how its mitigation position answers each of the five breaches identified.

Having listened to a number of Open Hearings during this examination, I have heard the Applicant defend individual Holford Rule breaches elsewhere on the route on the basis that routing decisions are judged case by case, and that breaking one rule at a given location is justified where it preserves compliance with others — for example, sitting closer to a dwelling in order to stay further from ancient woodland. I do not take issue with that approach in principle. But it does not describe what happened at this property. When [REDACTED] agreed, in person, that the route breaks every Holford Rule capable of applying at this location, his justification was not that some other rule had been preserved in exchange. It was, in words I recall clearly though there is no minute of the meeting, that the route "has to go somewhere." That is not a case-by-case weighing of competing rules; it is an acknowledgement that no rule was preserved at this location at all. I ask the ExA to treat this distinction as significant when assessing whether the cumulative breach at [REDACTED] was the product of a genuine routing judgement, or simply the point at which competing considerations elsewhere left this property with nothing weighed in its favour.

5. The Public Sector Equality Duty — the Real Question the Applicant Has Not Answered

The Applicant's response states that it "does not underestimate the seriousness" of what has been described, and that it "acknowledges and understands its obligations" to those with protected characteristics, such that "proportionate and effective support can be offered." I ask the ExA to test that claim against the timeline, not against its own wording.

[REDACTED] was told, in person, in summer 2024, of [REDACTED]. Two years passed. No equality impact assessment followed. No visit was initiated by the Applicant in that time. It was not until summer 2026, at Chelmsford, that [REDACTED] and I discussed [REDACTED] needs directly — and, by [REDACTED] own account, the first thing [REDACTED] identified as necessary to understand and respond to those needs was a site visit. That conversation took place little more than a month before this examination closes, leaving no time for the very step the Applicant's own external affairs lead considered the starting point. If the Applicant genuinely understood its obligations in 2024, there is no reason that site visit could not have happened then, when there were still years, not weeks, left in which to act on whatever it found. I ask the ExA to treat the two years of inaction between [REDACTED] visit and [REDACTED] identification of a site visit as necessary, as the true measure of whether the Applicant's professed understanding is reflected in its conduct.

Much of the correspondence in this case has become a dispute over whether the nearest pylon, following the Suffolk 3 realignment, is now the same distance, marginally closer, or marginally further from [REDACTED] than before. I set out the Applicant's own statements on this point precisely, because they do not agree with each other, and because I no longer think resolving the dispute to the metre is the question that matters most. The Applicant's own published document, "Environmental Implications of Change – Suffolk 3" (National Grid, January 2025, ref. AENC-ARC-CNS-REP-0004), states

that the change would move the alignment to the west of [REDACTED] rather than the east, and that the closest pylon would be the same approximate distance from the cottage in either scenario. The Applicant's formal response to my Deadline 6 submission states, in one place, that the realignment and overhead lines are both further away than before, and in another, that the two closest towers are simply no closer than before. [REDACTED] letter to me states that the nearest tower is marginally further away. Three formulations, from the same organisation, that do not agree with each other — and the Applicant's formal response itself confirms it "reviewed the distance from the closest towers to the centre of the property under discussion (the dwelling itself)," an approach precise enough to matter only if the change itself is so small that its own internal accounts cannot agree on its direction. That, in itself, makes my point. I recognise that moving the alignment further east was said not to be possible, given the proximity of the existing 1950s line and a Grade II listed farmhouse. Moving further west remained possible, but would have required at least one additional angle tower — and, on what I have observed of the Applicant's general approach through this examination, National Grid prefers to keep overhead lines as straight as possible, minimising angle towers wherever it can. That is a legitimate design preference in the ordinary case. But by the time this realignment was designed, [REDACTED] had specific knowledge that a person with protected characteristics, whose life he had been told was at risk, lived at this address — and a design preference for straighter lines is not, in my submission, a proper basis on which to decline a further move once that knowledge exists, at least not without an equality impact assessment first weighing the two considerations against each other. No such assessment was carried out. I ask the ExA to consider that omission, rather than the metre-by-metre dispute, as the one the Applicant has not answered.

The same January 2025 document confirms the Suffolk 3 change also introduces a new angle tower close to this property, in addition to the towers already accounted for in earlier assessments — a further 50-metre structure at close range that the Applicant's project-wide conclusion of "no change to the type or significance of landscape and visual effects" does not, in my submission, adequately answer at the level of a single isolated dwelling in what the Applicant's own documentation identifies as a 100% visibility zone.

I also address the one change the Applicant might point to as responsive to my concerns: the removal of the haul road from the eastern part of the property, where it had originally run through our back garden, within metres of our front door, directly through the site where I had told [REDACTED] we intended to build [REDACTED] annexe. I was present at the end of a separate meeting between [REDACTED] and a neighbouring farmer, [REDACTED], immediately before [REDACTED] came to see me that same day; that meeting's purpose was [REDACTED] request to move the haul road and towers off [REDACTED] field entirely, onto an existing public byway at its edge. I do not suggest the annexe played no part at all in where the haul road ended up — moving it away from [REDACTED] field may also, incidentally, have added weight to keeping it away from the annexe site. But the Applicant should not be able to point to a change substantially driven by an unrelated third party's request as evidence that it turned its mind to [REDACTED] circumstances and conducted the assessment the law required. Whatever mix of reasons produced that particular outcome, it remains the case that no equality impact assessment specific to [REDACTED] was ever carried out — not in response to the haul road, and not in response to the pylon position. I ask the ExA to require the Applicant to confirm whether any such assessment was carried out before the Suffolk 3 realignment was finalised, and if not, to explain how due regard under section 149 of the Equality Act 2010 was discharged.

6. The Acoustic and Visual Reality of This Property

The Applicant's conclusions on noise and visual impact do not, in my submission, reflect the specific physical reality of this property, for several concrete reasons.

Height and screening. The proposed pylons stand at approximately 50 metres. The hedgerows around this property are approximately 3 metres tall; most trees range from 10 to 20 metres, with a small number of mature trees reaching approximately 30 metres — still barely half the height of the proposed pylons. The existing vegetation on this property is thin, scattered, and predominantly deciduous, and cannot meaningfully screen a structure of this height: for some eight to nine months of the year, from autumn through to late spring, it carries no leaves at all, and even in full leaf it is neither dense nor continuous enough to block the sightline. This is confirmed by the existing 1950s alignment approximately one kilometre to the east, which remains visible from this property year-round through exactly this kind of vegetation — approximately ten pylons in summer with full leaf cover, rising to approximately twenty in winter. I ask the ExA to treat any reliance on the current hedgerow and tree cover as unsupported by the plain geometry and seasonal reality of what is actually there. A purposebuilt, dense, evergreen woodland belt, deliberately positioned and of sufficient depth, is a different proposition from what currently exists, and is addressed as part of the mitigation sought in Section 7 below.

The acoustic barrier. [REDACTED] sits at approximately 60 metres above sea level; the adjacent construction area at approximately 62 metres. A barrier placed at a location higher than the receptor loses much of its theoretical benefit, because the sound path clears the top of it; I understand this reduces the barrier's effectiveness to roughly one third of what it would otherwise achieve. This is compounded by the property's driveway, a tree-lined enclosed lane running directly from the construction area toward the cottage, which will function as an acoustic tunnel regardless of any barrier to the side, with construction also proposed to the north and south of the property.

Loudness is not the relevant measure. National Grid's accepted noise threshold at the property boundary is 65 decibels, with piling and similar activity capable of exceeding 100 decibels; the ambient level at this property on an ordinary day is approximately 20 decibels. Because the decibel scale is logarithmic, not linear, this is not a modest increase — it represents an increase in sound pressure of over 31,000 times. But for [REDACTED], the noises of most concern are not necessarily the loudest ones. Both have conditions that make them acutely sensitive to persistent, repetitive, low-level sound of the kind most people simply stop noticing — the operational hum and occasional crackle of 400kV lines in damp conditions falls squarely into this category, as does the reversing alarm of an HGV or the drone of continuous plant. A generic construction noise assessment pitched at a decibel threshold does not capture this, because the harm here is not about volume.

I understand that the only further mitigation [REDACTED] has indicated the Applicant is prepared to offer is advance notice of when the most extreme events, such as piling, will occur. I ask the ExA to consider what that actually means in practice, because it is a real question I cannot answer myself. If we are warned in advance, then what? Where are we expected to go, for how long, how often, over what may be three years of construction? What does repeatedly removing [REDACTED] from the one settled, familiar environment her stability depends on actually do to [REDACTED] — is enforced, repeated displacement from [REDACTED] own permanent home not itself a harm, potentially worse than remaining? And what of the seven dogs — trained working and security animals that bark at the approach of strangers, whose hearing is far more sensitive than a human's, and whose paddock sits directly against the

western acoustic barrier, meaning they will hear three years of continuous unfamiliar activity without ever seeing its source? Their sustained distress is a foreseeable welfare and household safety issue in its own right, and will itself add to the noise burden inside the house. Are they to be kennelled elsewhere for the worst periods, and if so, for three years, at whose cost? These are not abstract questions. They are the practical consequences of being told, in the Applicant's own words, that we are on "the frontline of construction," and I do not accept that a warning system, offered after two years of knowing [REDACTED] circumstances, a full review of [REDACTED] medical file, and a single rushed off-site hour discussing her needs, amounts to the proportionate and effective support the Applicant says it understands its obligations to provide. Noticing that harm is coming, and then handing the problem of surviving it back to the family, is not mitigation.

7. The Annexe and the Wider Mitigation Sought

The proposal to convert the eastern barn into a supported, independent living space for [REDACTED], described in my supplementary representation of 11 June 2026, remains the central request. It was a genuine long-term family plan before this project existed, deferred only for financial reasons; this project is what has turned a future ambition into a pressing welfare need, by placing the entire construction corridor on the opposite side of the property from where the annexe would sit. I maintain that funding its construction is a reasonable adjustment under the Equality Act 2010.

[REDACTED] letter indicates that the annexe request is likely to be assessed against whether expenditure is proportionate and fair to the wider body of consumers who fund the price control framework. I ask the ExA to weigh that reasoning against the fact that everyone who has actually engaged with our circumstances directly — and who are themselves electricity bill payers — has independently reached the opposite conclusion. Councillor [REDACTED] told over a hundred attendees at a public parish meeting that this property should be compensated given the scale of the impact upon it. Cotton Parish Council's [REDACTED] has separately and repeatedly told me the same. My local MP, [REDACTED] having spoken with my wife and me at length, did not disagree. This is not a request for a lump sum because we feel aggrieved; it is a request that National Grid fund a specific, costed piece of construction that protects a named, vulnerable person with protected characteristics. I ask the ExA to note that the only party who has suggested bill payers would object to this is the Applicant itself, and that everyone else with direct knowledge of this household's circumstances has said the opposite.

Beyond the annexe, the practical measures raised directly with National Grid's community impact team — and not, by design, set out with costings in this public submission — include: a respite fund allowing [REDACTED] to leave the property during the most acute construction phases; assistance relocating the dogs to a paddock away from the construction frontline; a purpose-built, dense, mixed native and evergreen woodland belt to the north and west of the property, deliberately positioned to substantially reduce visual dominance from the principal viewpoints year-round, rather than relying on the seasonal and insufficient cover the existing hedgerow provides; acoustic works to the existing house, including its windows, loft insulation, and internal wall lining; secured access to The Thicket woodland for firewood throughout construction, or alternative heating if access is genuinely severed; and clear, advance communication about construction activity timed to this household's specific needs. None of this is a demand for a sum of money. It is a request for practical, proportionate steps that only a genuine site visit and direct engagement could properly assess — which is precisely what has not yet happened.

8. Requests to the Examining Authority

In summary, I respectfully ask the ExA to:

- Note the true history of engagement in this case — two meetings in two years, both instigated by me, a cancelled visit that I offered to wait out, a month of silence, and a rescheduled visit falling after this deadline and, in two of three proposed dates, after the examination closes — and to weigh this against the Applicant's characterisation of "targeted engagement";
- Require the Applicant to confirm whether any equality impact assessment specific to [REDACTED] was carried out before the Suffolk 3 realignment was finalised, notwithstanding [REDACTED] specific prior knowledge of her circumstances, and if not, to explain how due regard under section 149 of the Equality Act 2010 was discharged;
- Require the Applicant to state its final position on the five Holford Rules breaches acknowledged by its Project Leader, and how the mitigation package answers each;
- Require the Applicant to confirm whether equivalent acoustic barriers are proposed to the north and south of this property, in addition to the west, and to address the specific elevation and driveway-tunnelling issues identified in Section 6 above;
- Require the Applicant to address the persistent, repetitive nature of the operational and construction noise specific to this property and its two residents with documented sensory sensitivities, rather than relying on a generic decibel-threshold assessment; and
- Take into account, in any recommendation to the Secretary of State, the annexe proposal as a reasonable adjustment under the Equality Act 2010; and recommend that the Secretary of State attach conditions to the DCO requiring the Applicant to properly assess and respond to the practical measures set out in Section 7 above — none of which have yet been assessed through the site visit repeatedly promised but not delivered.

I thank the ExA for its continued attention to this case, and for agreeing to receive medical information relevant to [REDACTED] circumstances in confidence.

Nothing in this statement precludes resolving these matters directly with the Applicant. I remain open to doing so at any point, including at any visit that does take place, whenever it takes place.

Note on the use of AI: AI (Anthropic's Claude) was used to assist in drafting, structuring, and revising this closing statement, based on facts, evidence, correspondence, and instructions provided by me throughout. All factual content, arguments, and positions taken are my own.

Karl Owen

Interested Party, [REDACTED]