

We have engaged constructively throughout the Examination because we recognise the importance of national electricity infrastructure. However, we remain deeply concerned that the Applicant has not demonstrated why the significant impacts on our home and land are necessary, why they cannot be further reduced, or why the extensive rights sought over our property are proportionate.

We maintain our objection to the Norwich to Tilbury Development Consent Order and ask that this summary is read alongside our attached detailed representation.

Having reviewed the Applicant's submissions up to and including Deadline 7, we remain unconvinced that the Applicant has demonstrated that the proposed development complies with the principles of the Holford Rules or that it represents the least harmful solution for those most directly affected.

Our property would be subject to the cumulative impacts of two proposed pylons, one immediately beyond the rear boundary in the adjoining field and one in the field opposite our home. Both would be permanently visible from our principal living rooms, bedrooms and garden. In addition, an access road is proposed immediately adjacent to our residential boundary. We have requested that this access be moved further into the adjoining agricultural field to reduce impacts on our home, but we have not received a satisfactory explanation as to why this has not been pursued.

The Applicant also seeks temporary survey access and permanent rights over several plots affecting our property. While we recognise that some rights may be necessary to deliver the project, we have not been provided with sufficient justification to demonstrate that the extent of the rights sought is necessary, proportionate or represents the minimum required.

We disagree with the Applicant's assertion that replacement planting means there will be no lasting environmental impact. Mature trees, established hedgerows and long-developed habitats cannot simply be replaced by new planting. The proposal will result in the loss and fragmentation of habitat used by deer, bats, badgers, owls, newts and other wildlife, together with permanent changes to the landscape that mitigation cannot fully reverse.

We also remain concerned about the suitability of narrow rural roads for construction traffic and future maintenance access. Existing heavy vehicle movements already damage verges and contribute to drainage and flooding issues. The Applicant has not adequately explained how these impacts will be prevented or managed.

The proposal would fundamentally change the setting and enjoyment of our home through permanent visual impacts, construction disturbance and ongoing operational activity. We also remain concerned that issues relating to residential safety, security, telecommunications resilience and the justification for the rights sought over our land have not been adequately addressed.

We respectfully request that the Examining Authority gives careful consideration to the matters raised in our attached representation before making its recommendation to the Secretary of State.

Norwich to Tilbury Development Consent Order

Deadline 8 Representation

Interested Parties: [REDACTED] (Person of Interest 2859) and [REDACTED] (Person of Interest 8024)

1. Introduction

1.1 We submit this representation to maintain our objection to the Norwich to Tilbury Development Consent Order (“the Proposed Development”). This representation should be read alongside our Deadline 8 summary submission.

1.2 We have reviewed the Applicant’s submissions made throughout the Examination, including those submitted up to Deadline 7. Whilst we acknowledge the importance of reinforcing the electricity transmission network and supporting the transition to a low-carbon energy system, we remain unconvinced that the Applicant has demonstrated that the proposed overhead line represents the least harmful solution for our locality or that the significant impacts on our property have been reduced so far as reasonably practicable.

1.3 Our concerns are not based on opposition to new electricity infrastructure in principle. Rather, they relate to the location and design of the proposed infrastructure immediately surrounding our home, together with the extent of the permanent and temporary rights sought over our land and the lack of justification provided for those rights.

1.4 In our view, the Applicant has consistently understated the cumulative impacts of the proposal on our property and has relied heavily on mitigation measures without adequately demonstrating that those measures will avoid or substantially reduce long-term harm.

2. Our Interest in the Application

2.1 We are the owners and occupiers of a residential property identified within the Examination as Interested Parties [REDACTED] (Person of Interest 2859) and [REDACTED] (Person of Interest 8024).

2.2 Our home is over 300 years old and has long formed part of the surrounding rural landscape. Although it is not a listed building, it is a historic dwelling whose character and enjoyment are closely linked to its rural setting. Over many years we have invested

considerable time and financial resources in maintaining and improving the property as our family home.

2.3 The Proposed Development would have a direct and lasting impact on our property.

2.4 The Applicant proposes to construct two electricity pylons in close proximity to our home. One pylon would be located in the agricultural field immediately beyond the rear boundary of our garden. A second pylon would be located in the field opposite our property. Both structures would be clearly visible from our principal living rooms, bedrooms and garden and would permanently alter the setting of our home.

2.5 In addition to the pylons themselves, the Applicant proposes an access route immediately adjacent to our residential boundary within the neighbouring field. Construction and maintenance activity would therefore take place directly alongside our home.

2.6 We have suggested that this access route could be moved further into the adjoining agricultural field to reduce the impact on our residential amenity. To date, we have not received a satisfactory explanation as to why this alternative has not been pursued.

2.7 The Applicant also seeks extensive temporary and permanent rights affecting our interests, including survey access and permanent rights over several plots associated with our property. Whilst we recognise that some land rights may be required to deliver nationally significant infrastructure, we remain unconvinced that the Applicant has demonstrated why the full extent of the rights sought is necessary or proportionate.

3. Summary of Our Continuing Objection

3.1 Our objection is based upon the cumulative effect of the Proposed Development rather than any single impact considered in isolation.

3.2 The Applicant's assessment tends to consider individual impacts separately. However, from the perspective of those living immediately adjacent to the development, these impacts combine to create a significantly greater overall effect.

3.3 In our case, these cumulative impacts include:

- two permanent electricity pylons surrounding our home;
- an access route immediately adjoining our residential boundary;
- construction activity adjacent to our property;
- works affecting the public highway outside our home;
- temporary survey access over our land;
- proposed permanent acquisition of rights affecting our property;
- long-term maintenance activity associated with the operational overhead line.

3.4 These impacts will fundamentally alter the character, setting and enjoyment of our home both during construction and throughout the operational life of the project.

3.5 We remain concerned that the Applicant has not adequately demonstrated:

- that the proposal accords with the principles of the Holford Rules;
- that impacts on residential amenity have been minimised wherever reasonably practicable;
- that the environmental impacts have been fully assessed, particularly in relation to mature habitats and biodiversity;
- that construction traffic can be accommodated safely on local rural roads;
- that the extensive land rights sought over our property are necessary and proportionate;
- that reasonable alternatives to aspects of the current design have been fully considered.

3.6 We therefore respectfully request that the Examining Authority gives careful consideration to the matters set out in this representation before making its recommendation to the Secretary of State.

4. The Holford Rules

4.1 The Holford Rules remain an important and well-established set of principles for the routing of overhead electricity transmission lines. Their purpose is to minimise unnecessary impacts on landscapes, communities and residential properties whilst recognising the need for strategic electricity infrastructure.

4.2 Whilst the Applicant has referred to the Holford Rules during the Examination, we remain unconvinced that the spirit of these principles has been achieved in relation to our property.

4.3 In our view, the proposal does not adequately minimise impacts on residential amenity. The siting of two pylons in close proximity to our home, together with an access route immediately adjoining our boundary, represents a substantial concentration of infrastructure affecting a single residential property.

4.4 We are also concerned that opportunities to reduce these impacts have not been fully explored. In particular, our request to relocate the proposed access route further into the adjoining agricultural field has not been meaningfully addressed. On the information available to us, it remains unclear why a design that would reduce impacts on our home has not been adopted.

4.5 More generally, we remain unconvinced that the Applicant has demonstrated that the current alignment represents the least harmful solution for those properties most directly affected.

4.6 The Holford Rules are intended to minimise harm wherever reasonably practicable. In our opinion, the evidence submitted during the Examination has not demonstrated that this objective has been achieved in relation to our property.

5. Environmental, Biodiversity and Climate Considerations

5.1 Lasting Environmental Effects

5.1.1 We remain unconvinced by the Applicant's assertion that replacement planting will result in there being no lasting environmental impact.

5.1.2 Whilst we welcome proposals to replace trees and hedgerows where practicable, newly planted vegetation cannot replicate the ecological, landscape and environmental value of mature trees and long-established hedgerows. These habitats have developed over many decades and support complex ecosystems that cannot simply be recreated through replacement planting.

5.1.3 Mature hedgerows and trees provide valuable habitat, shelter and connectivity for wildlife, contribute to the rural character of the landscape, assist with drainage and surface water management and store carbon. Their loss cannot be regarded as temporary simply because replacement planting is proposed.

5.1.4 Replacement planting will take many years, and in many cases decades, to mature. During that period there will inevitably be a reduction in habitat quality, ecological connectivity and landscape character.

5.1.5 In addition, the operational requirements of an overhead electricity corridor require ongoing vegetation management to maintain statutory safety clearances. This means that replacement vegetation will never be able to develop in the same way as the mature landscape that currently exists.

5.1.6 The existing mature trees and hedgerows around our home are not merely landscape features. They contribute to biodiversity, provide screening and privacy, support drainage and help define the historic rural character of our property. Their loss therefore has environmental, visual and residential consequences which cannot be fully addressed through replacement planting.

5.1.7 For these reasons, we do not agree that the proposal will have no lasting environmental effects. The impacts may be reduced through mitigation, but they cannot be entirely removed.

5.2 Biodiversity

5.2.1 The countryside surrounding our home supports a diverse range of wildlife including deer, badgers, bats, owls, newts and numerous bird species.

5.2.2 These species rely upon the existing network of mature trees, hedgerows, field margins and relatively undisturbed rural habitat.

5.2.3 Construction activities will inevitably involve vegetation clearance, heavy machinery, lighting, noise and prolonged human activity. We remain concerned that these works will disturb established wildlife, fragment habitats and reduce biodiversity, both during construction and for many years afterwards.

5.2.4 Whilst the Applicant proposes mitigation measures, we remain unconvinced that sufficient evidence has been provided to demonstrate that these measures will fully compensate for the loss of mature habitats or avoid long-term ecological impacts.

5.2.5 We respectfully submit that greater weight should be given to the value of protecting existing mature habitats rather than relying predominantly upon replacement planting as mitigation.

5.3 Climate Change

5.3.1 We recognise the importance of reinforcing the national electricity transmission network to support the transition to a lower-carbon energy system.

5.3.2 However, the wider public benefits of the project should not diminish the Applicant's responsibility to minimise environmental harm wherever reasonably practicable.

5.3.3 Climate change should be considered not only in terms of the operational purpose of the infrastructure but also through the environmental consequences of its construction, including the loss of mature vegetation, disturbance of carbon-storing soils and the long-term management of the transmission corridor.

5.3.4 We remain unconvinced that these wider environmental considerations have been given sufficient weight when balancing the impacts of the Proposed Development against alternative approaches.

6. Residential Amenity, Privacy and Quality of Life

6.1 A Cumulative Impact on Our Home

6.1.1 We remain concerned that the Applicant has assessed individual impacts separately rather than considering their combined effect on our home and family.

6.1.2 In our case, the Proposed Development includes:

- two permanent electricity pylons immediately surrounding our home;
- an access route immediately adjoining our residential boundary;
- prolonged construction activity adjacent to our property;
- works affecting the public highway outside our home;

- temporary survey access across our land;
- proposed permanent rights affecting our property; and
- future maintenance activities associated with the overhead line.

6.1.3 These impacts should not be viewed in isolation. Collectively, they would fundamentally alter the setting, character and enjoyment of our home throughout both the construction period and the operational life of the project.

6.1.4 Our home has formed part of the rural landscape for approximately 300 years. Whilst it is not a listed building, it is a long-established family home whose character is closely linked to its peaceful rural surroundings. We have invested significantly in maintaining and improving it and expected to continue enjoying it in that setting.

6.2 Construction Impacts

6.2.1 Construction is expected to continue over an extended period and would bring heavy machinery, construction traffic, noise, dust, lighting and workforce activity immediately adjacent to our home.

6.2.2 These impacts are significantly increased because the proposed access route is located directly alongside our residential boundary.

6.2.3 We have requested that this access route be relocated further into the adjoining agricultural field to reduce the impact on our home. To date, we have not received a satisfactory explanation as to why this alternative has not been adopted or fully considered.

6.2.4 In our view, the Applicant has not demonstrated that the proposed arrangement represents the least harmful option for neighbouring residents.

6.3 Privacy, Security and Residential Wellbeing

6.3.1 We live in a small rural village characterised by relatively low levels of traffic and activity. The proposed construction works would represent a substantial change to that environment.

6.3.2 The prolonged presence of construction traffic, contractors and site activity immediately alongside our residential boundary will inevitably affect the privacy and enjoyment of our home.

6.3.3 Our concerns are heightened because our property has previously been the subject of a burglary. We therefore place particular importance on the security and privacy of our home.

6.3.4 We fully appreciate that construction workers will be carrying out legitimate activities. However, we remain concerned that the Applicant has not adequately explained what practical measures will be implemented to safeguard the privacy, security and wellbeing of residents whose homes are located immediately adjacent to the works.

6.3.5 We are also concerned about the impact on our family's day-to-day life. Our son works night shifts and relies on being able to rest during the day. Prolonged construction noise and activity immediately adjacent to our home has the potential to significantly disrupt normal family life.

6.4 Telecommunications

6.4.1 Our property is not served by fibre broadband and instead relies upon a fixed wireless connection using an external antenna.

6.4.2 This connection supports our day-to-day communications, home working, television services and security systems.

6.4.3 We remain concerned about whether the Proposed Development could affect the reliability of this service during construction or operation.

6.4.4 We have not seen sufficient information explaining whether this issue has been assessed or, if any disruption were to occur, what measures would be put in place to maintain continuity of service for affected residents.

7. Highways and Construction Traffic

7.1 We remain concerned that the local highway network is not well suited to the scale of construction traffic likely to be generated by the Proposed Development.

7.2 The roads serving our property are narrow rural lanes which already experience damage to verges from existing heavy vehicle movements associated with local commercial activity.

7.3 During periods of wet weather, these existing problems contribute to drainage difficulties and localised flooding. Additional heavy construction traffic has the potential to exacerbate these issues.

7.4 Whilst the Applicant has proposed traffic management measures, we remain unconvinced that sufficient evidence has been provided to demonstrate how rural roads, verges and drainage will be protected throughout the construction period.

7.5 We respectfully request that the Examining Authority carefully considers whether the Applicant has demonstrated that construction traffic can be managed safely and without unacceptable impacts on the local highway network or neighbouring residents.

8. Temporary Possession, Survey Access and Permanent Land Rights

8.1 General

8.1.1 In addition to the impacts arising from the proposed overhead line itself, the Applicant seeks temporary and permanent rights affecting our interests as Interested Parties [REDACTED] (Person of Interest 2859) and [REDACTED] (Person of Interest 8024).

8.1.2 These include temporary access for surveys and investigations together with the acquisition of permanent rights affecting a number of plots associated with our home.

8.1.3 We recognise that nationally significant infrastructure projects may require powers over private land in certain circumstances. However, such powers should be no more extensive than is reasonably necessary and should only be granted where their necessity has been clearly demonstrated.

8.1.4 We remain unconvinced that the Applicant has adequately demonstrated that the full extent of the temporary and permanent rights sought over our land is necessary, proportionate or represents the minimum rights required to deliver the Proposed Development.

8.2 Extent of Rights Sought

8.2.1 The Applicant seeks rights affecting several plots associated with our residential property, including land, garden areas and telecommunications interests.

8.2.2 Whilst we appreciate that the Examination has considered compulsory acquisition and temporary possession generally, we remain unconvinced that the Applicant has adequately explained why the specific rights sought over our property are necessary.

8.2.3 We have not been provided with a clear explanation of why the extent of the permanent rights sought is required, whether alternative approaches have been fully considered or whether the same objectives could be achieved through more limited rights.

8.2.4 We respectfully request that the Examining Authority carefully considers whether the Applicant has demonstrated that the rights sought over our property are necessary, proportionate and represent the minimum land take and rights required.

8.3 Temporary Survey Access

8.3.1 We also remain concerned about the temporary survey access sought across our residential property.

8.3.2 We recognise that surveys may be necessary to support the development of nationally significant infrastructure projects. However, we have not been provided with

sufficient explanation as to why access to our land is required at all. If access is considered necessary, we have also not been provided with a clear justification as to why access is required across the entirety of our residential land.

8.3.3 Our land is used solely for residential purposes and is not required for the siting of any permanent project infrastructure. This reinforces our concern that the Applicant has not adequately demonstrated why such extensive temporary access rights are required.

8.3.4 We remain unconvinced that the Applicant has demonstrated that the extent of the temporary rights sought represents the minimum reasonably necessary to undertake the proposed surveys.

8.3.5 We have also not been provided with sufficient information regarding how such access would be managed in practice, including the nature of the surveys to be undertaken, the areas to be accessed, the anticipated frequency and duration of visits, the number of personnel involved, the equipment to be used, or the measures that would be implemented to protect our privacy, security and residential amenity.

8.3.6 We respectfully request that the Examining Authority carefully considers whether the Applicant has adequately demonstrated the necessity and proportionality of the temporary survey access sought over our residential property.

8.4 Proposed Access Route

8.4.1 We remain particularly concerned by the proposed construction access route immediately adjoining our residential boundary.

8.4.2 During the Examination we requested that this route be relocated further into the adjoining agricultural field. In our opinion, this would materially reduce the impact on our home and residential amenity whilst still allowing the Applicant to construct and maintain the proposed infrastructure.

8.4.3 To date, we have not received a satisfactory explanation as to why this alternative has not been adopted or why the proposed location is considered necessary.

8.4.4 We respectfully submit that this illustrates a wider concern throughout the Examination. Where opportunities appear to exist to reduce the impacts on directly affected residents, we have not always been provided with a clear explanation of why those opportunities have not been pursued.

9. Socio-economic and Financial Impacts

9.1 Uncertainty

9.1.1 The planning process has already had a significant impact upon our family.

9.1.2 For a considerable period we have lived with uncertainty regarding the future of our home, the extent of the rights sought over our land and the possibility of major electricity infrastructure being constructed immediately adjacent to our property.

9.1.3 This prolonged uncertainty has affected our ability to plan confidently for the future and has become an ongoing source of concern.

9.2 Our Home

9.2.1 Our home is far more than a parcel of land identified on the Land Plans.

9.2.2 It has stood within the rural landscape for approximately 300 years and has been carefully maintained and improved over many years as our family home.

9.2.3 We chose to live here because of its peaceful rural setting, privacy and close connection with the surrounding countryside.

9.2.4 The Proposed Development would permanently and fundamentally change that setting through the introduction of two electricity pylons immediately surrounding our home, together with associated infrastructure and ongoing maintenance activity.

9.3 Financial Consequences

9.3.1 Our home is also our family's principal financial asset.

9.3.2 We remain concerned that the uncertainty created by the Proposed Development has already affected, and will continue to affect, the marketability of our property whilst the planning process remains unresolved.

9.3.3 Should the Proposed Development proceed as currently proposed, we are concerned that the proximity of two electricity pylons, together with the associated infrastructure immediately adjoining our home, has the potential to adversely affect the desirability, marketability and value of our property.

9.3.4 We recognise that the precise financial effect cannot be known in advance and that property values are influenced by a range of factors. Nevertheless, we consider these concerns to be genuine and reasonable for homeowners whose properties would be directly affected by nationally significant infrastructure of this scale.

9.3.5 Whilst property value alone is not determinative of planning decisions, the wider financial consequences for directly affected households form part of the overall burden imposed by the Proposed Development and should be considered alongside its impacts on residential amenity, wellbeing and quality of life.

9.4 Compensation

9.4.1 We wish to make clear that our objection is not motivated by compensation or financial gain.

9.4.2 We are not seeking payment in exchange for accepting the impacts of the Proposed Development.

9.4.3 Our wish is simply to preserve our home, its setting and the surrounding environment as they exist today.

9.4.4 We recognise that statutory compensation provisions may apply in certain circumstances. However, compensation cannot restore the rural setting of our home, replace mature trees and established habitats, or remove the permanent presence of major electricity infrastructure immediately adjacent to where we live.

9.4.5 Nor can compensation remove the prolonged uncertainty experienced by affected homeowners throughout the planning process or fully address the lasting impacts on residential amenity and quality of life.

9.4.6 We therefore respectfully submit that the existence of compensation provisions should not diminish the Applicant's responsibility to demonstrate that every reasonable step has been taken to avoid or minimise harm and that the rights sought over our land are no more extensive than is reasonably necessary.

10. Conclusion

10.1 We recognise the national importance of reinforcing the electricity transmission network and do not object to the principle of investing in critical infrastructure.

10.2 However, nationally significant infrastructure should be delivered in a manner that minimises unnecessary harm to those communities and households that bear its greatest local impacts.

10.3 Having reviewed the evidence submitted throughout the Examination, including the Applicant's submissions up to Deadline 7, we remain unconvinced that the Applicant has demonstrated that:

- the cumulative impacts on our home have been minimised wherever reasonably practicable;
- the proposal fully reflects the principles of the Holford Rules in relation to our property;
- the proposed access arrangements represent the least harmful solution for neighbouring residents;
- replacement planting will adequately mitigate the long-term environmental impacts arising from the loss of mature habitats;
- the temporary and permanent rights sought over our land are necessary, proportionate and represent the minimum rights required; or
- sufficient weight has been given to the long-term impacts on our home, our family and the surrounding rural environment.

10.4 Our objection is not based upon opposition to electricity transmission infrastructure in principle. Rather, it is based upon the significant and permanent impacts that this proposal would have upon our home and the absence of sufficient evidence demonstrating that those impacts have been reduced as far as reasonably practicable.

10.5 We respectfully request that the Examining Authority carefully considers the matters raised within this representation before making its recommendation to the Secretary of State.