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Mr Simon Pepper
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Our Ref 2022/1116
16 June 2022

Dear Mr Pepper
Planning Act 2008: East Anglia GREEN Project

South Norfolk Council's Response to informal public consultation between 21 April and 16 June to the non-statutory pre-application consultation undertaken by National Grid Electricity Transmission for the proposed National East Anglia GREEN National Infrastructure Project (NSIP).

This is the response from South Norfolk Council of **Objection** to the proposed project.

Introduction and overview of the project

East Anglia Green Energy Enablement (GREEN) - National Grid owns and manages the high voltage electricity network in England and Wales connecting homes and businesses to the energy they need. Since being built in the 1960s, the network in East Anglia has been sufficient to meet local needs. The Council recognises the need for increased capacity to the existing electricity transmission networks across the Eastern Region in order to cope with the additional electricity being generated from offshore windfarms. The Council equally appreciates that the Government has set a commitment to reach net zero greenhouse gas emissions by 2050 and an ambition to connect 40 GW of offshore wind by 2030.

The proposals are for a new 400kV electricity overhead transmission line in East Anglia running from Norwich (National Grid's Norwich Main substation) to Tilbury in Essex. They will also need to carry out some work at existing substations along the proposed route and build a new substation in the Tendring district to connect new offshore wind projects close to the coast.

The reinforcement in South Norfolk will consist of new overhead lines supported by steel lattice pylons of 50metres in height with a distance of 350metres between the pylons. The Council recognises that at this stage the preferred route is large and does not show the precise route of the new overhead lines and supporting pylons.

Summary of our Position

The Cabinet gave consideration to the GREEN proposal at its meeting on Monday, 13 June 2022. The debate can be viewed online here:
<https://www.youtube.com/channel/UCZciRgwo84-iPyRImsTCIng>

In essence, the Council completely understands and acknowledges the need to increase capacity to the electricity network so that energy generated offshore can reach residential and industrial consumers towards London and the Midlands. It also recognises the national challenge of planning positively for a post-carbon work and achieving net zero by 2050, together with the ongoing energy security

However, the imperative of getting electricity to market should not be at the expense of the open landscapes, heritage assets, wildlife sites, economy and wider environmental life of our district.

As submitted, it is considered that the East Anglia GREEN project would have a significant detrimental impact on the environment of South Norfolk. The Council is not satisfied that the project in its present form with its proposed overhead lines and lattice pylons is the most appropriate solution to National Grid's need for increased capacity.

We are concerned that the proposal has been made which has not obviously been compared with other routes including offshore or immediately adjacent to existing routes. Neither have any mitigations been enumerated including partial burying in the most sensitive locations, avoidance of listed buildings, pylon design. It is not clear how potential impacts on businesses and associated tourism activity has been taken into account. Of great concern is the realisation that the important Market Town of Diss would be surrounded on three sides by intrusive pylons and pass through the Roydon Fen.

Further, there have been insufficient attempts to engage with local people, businesses and interested bodies and that is to be regretted and corrected. In particular we would like to note that for this informal public consultation, holding just one Public Information event in Mulbarton is inadequate given: the length of the route; the number of parishes affected by the proposed project; that National Grid agreed with the Council which Parish Councils should be consulted as part of the process and it would appear that these parishes were not informed either in a timely manner or at all.

Whilst the principle of getting electricity to market is accepted absolutely, the case for this proposal has not been made at all.

Significantly more work alongside associated consultation & engagement will be required including a comparison of route options and detailed line configuration along the routes and assessments made on a monetary and non-monetary basis will be necessary. Only when this is available, should the project progress to the next step.

South Norfolk Council stands by to facilitate the proper engagement with all interested parties and is ready to allow both proposers and objectors to make their case in a constructive and respectful manner.

Alternative Solutions

The Council's considers that an **Offshore approach** should be given further consideration by National Grid and this would be our preferred solution.

In the event that the need for onshore route can be demonstrated by National Grid, then the Council considers that the whole of the route should, from a landscape and visual impact, be placed underground. We maintain this position notwithstanding the National advice regarding undergrounding in regards to only sensitive nationally designated landscapes.

If that is not possible, then a more detailed consideration of the impact on the designated ecological sites; landscape sensitivities and the numerous heritage assets should be made. It should be noted that South Norfolk has more listed buildings than any other Council area in Norfolk and due consideration needs to be had to the route in that regard

We would expect the rationale and relative scoring of the various route and configuration options should be fully explained and quantified within the EIA and the submission.

In view of the above and in the absence of a fuller understanding to why a strategic offshore approach to deliver the network reinforcement objectives of this project to cope with the additional electricity being generated from the offshore windfarms that South Norfolk and the other Norfolk Authorities are already having to host in terms of cable routes and substations, the Council **objects** to the proposed development at this time.

Main Technical Issues/considerations

Should the National Grid sustain its approach, matters would be tested at the Examination via the DCO process. To assist, the Council has set out below some of the matters that the SOS will need to robustly consider.

Given the information provided by the developer is limited due to the stage the project is at, the following are the main issues the Council would like to raise in this response and wishes to reserve the right to raise other issues as the project moves forward to the Statutory public consultation April – June 2023.

Impact on Heritage Assets

The EIA should include a Heritage Impact Assessment. The Council's Senior Heritage and Design Officer has given preliminary consideration to the route and potential impacts on high graded listed buildings and noted the following listed buildings are likely to be impacted by the proposal, this list is not exhaustive and does not prejudice the consideration of other heritage assets:

Gowthorpe Manor grade II*

Kenningham Hall is a small farmhouse and there is an archaeological site of the old village to the west of it.

Flordon Hall – the impact of seeing a line of pylons in the backdrop of this hall in views from Long Lane (or even having pylons in the foreground as that is in the route) is likely to have a considerable harm to the setting of this grade II* listed building.

Mergate Hall is quite well screened to the south by vegetation but immediately to the south of it the views are quite expansive, again the proposal would be likely to have a considerable impact on the setting of this grade II* listed building.

There are some very important listed buildings in Tacolneston including the grade I church, grade II* Tacolneston Old Hall and The Manor House – late C16th and one of the most important buildings in the district. The proposed development is likely to have a considerable harm to these listed buildings.

There are a number of listed buildings along Low Road/Forngett St Mary to the east – but without further details it is difficult to assess the impact in terms of harms.

Both the above settlements are Conservation Areas.

Winfarthing Church and Shelfanger Church, both grade I, which may be affected.

The Council would also raise that there are many Grade II listed buildings which also could be affected depending on where the route is placed and these have not been included in this list.

Impact on Ecology

The Council's Ecologist has commented as follows:

The Preferred Corridor has been designed to avoid national and internationally important designated sites although it will pass close to several sites including Shelfanger Meadows SSSI, Aslacton Parish Land SSSI, Forngett Meadows SSSI and Flordon Common SSSI, which is a component site of the Norfolk Valley Fens Special Area of Conservation. The potential for Likely Significant Effects on Flordon Common SAC has been identified by National Grid and they anticipate that as a result of embedded design measures no Likely Significant Effects would be expected and a No Significant Effects Report (NSER) would be adequate. Consideration will need to be given to the People over Wind Judgement with regards to what constitutes 'embedded design measures' compared to 'mitigation measures'.

In accordance with EN-1 (Overarching National Policy Statement for Energy) the project will need to demonstrate how opportunities to conserve and enhance biodiversity interests have been incorporated within the scheme. This will necessitate consideration of County Wildlife Sites (including Long Lane Wood CWS, Flordon Meadows West CWS, Flordon Meadows East CWS, Baye's Meadow CWS, Hapton Common CWS, Brock's Watering CWS, Brick Kiln Lane, Bunwell Hills CWS, and Carleton Rad Fen CWS which lay within/adjacent to the proposed path and Roadside Nature Reserves as Routeing Constraints within the Routing and Siting Study Report (April 2022). Consideration should also be given to the siting of proposed access roads and laydown/storage areas and associated visibility displays to minimise impacts on vegetation (hedges/trees/scrub), and hedges identified as important under the Hedgerow Regulations 1997. Any SuDS associated with the substation should be designed in line with sustainable-drainage-systems.pdf (rspb.org.uk).

The Risk and Opportunity mapping exercise should also explore existing GI assets and use this to identify where new connections could be made for example, through extra tree and hedge planting beyond that needed to mitigation, to maximise gains. Consideration should also be given to how management could be used to enhance existing assets and contribute to the local Nature Recovery Network. Biosecurity protocols will need to be followed to avoid the spread of invasive non-native species.

National Grid have committed to delivering a 10% Net Gain target the natural environment | National Grid Group and we would encourage them to commit to maximising this were possible e.g. through using no top soil and planting hedges with trees. BNG reporting should use the latest version of the Defra Metric (currently 3.1) and reporting should comply with best practice guidance e.g. BS8683:2021. Management plans will need to be prepared to ensure BNG targets are achieved and maintained for the lifespan of the scheme.

The final route should be informed by the results of up-to-date ecological surveys undertaken in accordance to industry standards. All species data should be shared with the relevant Norfolk Biodiversity Information Service at the earliest opportunity.

Impact on Landscape

A full Landscape and Visual Impact Assessment should be part of the EIA, undertaken in accordance with the accepted industry guidance.

The key landscape and visual impacts will result from the overhead lines and pylons and the Council consider that they would have a significant detrimental impact on the landscape character and visual amenities of this part of South Norfolk.

Existing hedgerows - Assessments should be made in reference to the Hedgerows Regulations, including that of each hedge as to its 'importance' as defined by criteria set out in the Regulations; in addition to species composition and condition, these also include other ecological considerations and historical and archaeological factors too. Our local plan policy DM4.8 presumes in favour of retention of important hedgerows unless the need for, and benefits of, a development clearly outweigh their loss. The Council is concerned at the potential loss of landscape features such as ancient woodlands, hedgerows and trees.

Waveney Valley which is in landscape terms is an unspoiled tranquil landscape is more sensitive to infrastructure, if an onshore route is demonstrated then this part of the route should be underground.

Due regard should be given to South Norfolk Landscape Character Assessments when producing the Landscape Visual Impact Assessment for the EIA. The Landscape Character Assessments are comprehensive, detailed studies of the landscape and environment. In 2001 Land Use Consultants undertook a Landscape Character Assessment of the South Norfolk district.

This work was updated and reviewed by Chris Blandford Associates in 2012 to provide evidence to support the emerging new Local Plan. The Chris Blandford Associates 'South Norfolk Local Landscape Designations Review' work should be read in conjunction with the 2001 Landscape Character Assessment.

The Council will expect National Grid to fully consider cumulative landscape impact of the project, including the existing pylons and infrastructure in the area. Equally, justification for not using the 'new type 35m' pylons rather than the 50m lattice pylons.

Noise and Pollution

The key noise and pollution considerations are the impacts of the construction of and the operation of the proposal on the amenities on local residents.

In view of the above, with regards to specified works to be undertaken issues relating to Control of Noise, Air Quality, Artificial Light, Waste Management, Pollution Prevention, Contamination Assessment and Mitigation and Working Hours should be submitted as part of a detailed construction management plan. The Council wishes to be assured that issues

relating to hours of construction, siting of any standby generators, good practise procedures, prior notification of constructional noise, floodlighting, movement and storage of waste materials, public safety, dust control, emissions are addressed. Equally a Health Impact Assessment to form part of the EIA, which specifically addresses electronic magnetic radiation.

Economic Development and skills

National Grid are requested to produce a Skills and Employment Strategy to deliver training, skills and employment opportunities to the local economy. It is essential to South Norfolk that the economic benefits are maximised for the communities that are hosting the project which will have a significant impact on their environment.

Economic Impacts – existing businesses

The Council considers the proposal will have a potential detrimental impact on a number of established businesses in the district.

Two examples are cited below. However, we would expect full consideration by National Grid of all businesses on the route.

The proposal site passes across the Bressingham Steam Museum. It is invidious to single-out a particular business but the effect on this enterprise illustrates the complexity of the issues: It operates a steam museum as a visitor attraction. The associated garden centre is a popular retail destination and it abuts a sensitive County Wildlife site. Any plan will need to mitigate the effects on this and similar businesses along the route.

Tibenham Airfield lies on the route and this project will affect the operation of that commercial airfield.

Bringing Power into Norfolk

The proposals as set out by National Grid, do not bring any direct or immediate benefit to Norfolk in terms of bringing clean energy to existing, planned development. Norfolk has significant planned housing and employment growth and therefore National Grid should give consideration to how Norfolk could potentially benefit from the project and the offshore windfarms it is hosting.

Community Benefits

The Council is aware that other developers have and are proposing to provide Community Funds for the benefit of those communities affected by NSIP's. It is requested that National Grid equally commit to providing a Community Benefit Fund to seek localised benefits to South Norfolk communities to offset the significant impacts the project will create.

Yours faithfully

A handwritten signature in dark ink that reads "Helen Mellors". The signature is written in a cursive style and is underlined with a single horizontal stroke.

**Helen Mellors
Assistant Director
Planning
South Norfolk Council**