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Sent via email: simon.pepper@nationalgrid.com

21 August 2023

Dear Mr Pepper

Planning Act 2008: Norwich to Tilbury Project

South Norfolk Council's Response to the second Non-Statutory Consultation between 27 June and 21 August 2023 undertaken by National Grid Electricity Transmission (NGET) for the proposed Norwich to Tilbury (NT) National Infrastructure Project (NSIP).

This is the response from South Norfolk Council who maintains its **Objection** to the proposed project.

These comments build upon the formal response the Council made to the first non-statutory consultation, as such the concerns raised in our previous comments still stand.

Consultation Process

Before we turn to the substance of our response to the Non-Statutory Consultation, we wish to reiterate this Council's disappointment with the consultation process itself. We wrote to you outlining our concerns on 6 July 2023 (attached). We will not repeat the detail of that letter save to say that, in respect of the process:

- The short timescales following the announcement of the consultation and the limited number of public engagement events made it difficult for local residents and organisations like parish councils to participate.
- The timing of the consultation during the summer holiday period has made it difficult for organisations like parish councils to respond in a formal manner as many do not meet in July and August. Extending the consultation period to September would have enabled more contributions of a better quality to have been made.
- As we will detail below, there has been no real optionality to the consultation or information justifying the NG route. Specifically, information allowing alternatives has not been provided to allow the public to assess whether the offshore route could be practicable or information relating to complete or partial burying around sensitive landscapes.

- And whole limbs of consultation have been omitted including, for example, potential pylon designs and the visual impact of those.

Consultation should provide sufficient information for interested parties to assess various options at a formative stage and give the opportunity for evidence-based responses. Sadly, this process has been marred by a lack of detail and a rushed timescale in the summer months that have prejudiced the ability of interested parties to make their case.

Introductory Context

Norwich to Tilbury (NT) 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. We recognise that the sources of electricity are now more diverse and distributed than before with the need for burst capacity when the sun shines or the wind blows hard. We understand that new demand from new homes and electric vehicles amongst other things require additional capacity. The world has changed and the grid needs to change with it.

South Norfolk Council recognises the need for increased capacity to the existing electricity transmission networks across the Eastern Region in order to cope with the additional new energy generation from offshore windfarms, nuclear power and interconnection with other countries and particularly the significant amount of energy generation above current capacity connecting into Norwich Main and Necton.

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 50 GW of offshore wind by 2030.

Just because we understand the need to change doesn't mean that we should just accept a single choice. Whilst the energy will pass through our territory to other areas, we are impacted by proposals for which we receive little benefit. Attenuating the visual and landscape impact on our district is a material consideration and one that has received inadequate consideration in the development of the proposals.

Overview of the project

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 a standard steel lattice pylons of 50metres in height with a distance of 350 metres between the pylons. It will start at Norwich Main substation, running to the west of the district, crossing the River Waveney into Suffolk.

The current consultation does not change the proposed project from that previously commented upon, it is essentially the same preferred route corridor, subject to some limited localised refinements. The change following the first non-statutory consultation for South Norfolk:

West of Roydon and immediately south of the A1066, the alignment would diverge from the preferred draft corridor presented in 2022. The alignment will now turn to the east of Wortham Ling – referred to as East of Wortham Ling.

Summary of our Position

Whilst recognising the potential importance of the Norwich to Tilbury (NT) project, in meeting the need to increase capacity to the electricity network, the Council maintains our objection to the proposed project as it stands, as agreed by South Norfolk's Cabinet at its meeting on Monday, 13 June 2022, when we considered the first non-statutory consultation.

As submitted, noting the changes from the 2022 preferred route corridor, the project presented still proposes standard lattice pylons through South Norfolk. It is considered therefore, that the Norwich to Tilbury (NT) project would continue to have a significant detrimental impact on the environment of South Norfolk. The Council maintains its stance that we are not satisfied that the project in its present form with its proposed overhead lines and standard lattice pylons is the most appropriate solution to National Grid's need for increased capacity. 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.

The concerns the Council has to the project are supported by the Leaders of the Norfolk Councils as set out in their letter dated 17 July 2023, which is attached to this response.

This second non-statutory consultation again does not have any mitigations been enumerated including undergrounding in the most sensitive locations, avoidance of listed buildings, pylon design. Of great concern, which remains, is the realisation that the important market town of Diss would be surrounded on three sides by intrusive pylons and pass through the Waveney River Valley.

It is unacceptable that the proposals would 'fence-in' the historic market town of Diss in such an intrusive manner. A consultation that does not flesh-out the detail of the potential pylon designs and the visual appearance in relation to Diss (and indeed other sensitive landscapes) leaves interested parties incapable of assessing the proposals fully and responding accordingly.

Furthermore, as the Council has previously raised the timing of the consultation over the summer makes it difficult for our residents, businesses, and parish councils to engage and submit formal comments with their views regarding the project, which will have a significant impact upon them. Despite the Council's request to extend the consultation, National Grid has not extended the consultation period.

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

Significantly more work alongside associated consultation and 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. To this end it is not clear why a completely new route has been chosen over one which more closely aligns to the existing route.

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

Offshore

The Council still considers that a coordinated, **Offshore approach** should be given further consideration by National Grid and this would be our preferred solution, to minimise onshore infrastructure.

National Grid have stated that:

At this consultation we have published our Strategic Options Backcheck and Review (SOBR), which re-examines the work we undertook in 2022. The SOBR concludes that our work and decisions made in 2022 to discount the offshore option remain valid.

Adding further to support their decision:

We have considered offshore options, including a connection between the existing substation at Norwich and the existing Tilbury substation -approximately 220 km. This is proven technology but there are particular challenges in this instance:

*Capacity of HVDC is one third that of an overhead line.
High-voltage alternating current (HVAC) and High-voltage direct current (HVDC) conversion.
Not without impacts and cost.
Thames estuary*

Capital cost would be £895million for current proposal and approx. £4billion for simplest offshore design

As the cost of all connections ultimately goes onto the electricity bills of domestic and business consumers, the UK government, and our regulator Ofgem require us to develop proposals which represent value for money to consumers. An offshore connection would have a third of the capacity of an overhead line – to carry the same amount of power generation, three offshore links would be needed as well associated infrastructure such as converter stations near the existing substations at Norwich Main substation and Tilbury. Offshore connections can be more expensive and our evaluations found that subsea options would not represent the best value or most effective way to deliver the electricity needed.

In view of this, we concluded that the onshore option best meets the obligations set out under our Licence and by Ofgem to be economic and efficient.

The Council has reviewed the Backcheck and Review report and the section dedicated to the offshore option, however, we consider a more detailed assessment should be provided by National Grid that clearly and plainly sets out for residents and business why an offshore option cannot be pursued.

It is noteworthy that the consultation features offshore proposals between Sizewell and Kent so it is unconvincing to simply assert that offshoring as far as Sizewell or Bradwell is impractical. More justification is required.

Put simply, insufficient technical or financial information has been provided to allow interested parties to assess whether the challenges of offshoring could be sufficient to overcome the disbenefits to our District.

Undergrounding – in whole or part

The Council understands that current or emerging planning policy frameworks for electricity does not support full undergrounding, however the new draft policy does support undergrounding in sensitive areas outside nationally designated landscapes. Clearly, notwithstanding the above our preference would be for the route to be fully underground.

National Grid have stated:

With regards to undergrounding, we also have to consider the national policy statements. EN-5 is the National Policy Statement (NPS) which covers developing new electricity networks infrastructure and it states that the government expects overhead lines will often be appropriate. The NPS does recognise that there will be cases where this is not so, for example, at particularly sensitive locations, where potential adverse landscape and visual impacts of an overhead line may make it unacceptable in planning terms, taking account of the specific local environment and context. Our proposals for the draft indicative route alignment includes additional areas of undergrounding compared to what we presented in 2022, following consultation feedback, and we welcome suggestions for locations of potential further undergrounding as part of this current consultation. All suggestions received as part of the consultation period will be considered carefully.

The Council has previously suggested undergrounding at the Waveney River Valley, where the route passes from Norfolk to Suffolk, but this has been discounted. We still remain of the view that there is a strong case for undergrounding where the line crosses the Waveney Valley including County Wildlife sites at Roydon Fen and Wortham Ling due to its sensitive landscape and this would be supported by the new draft policy.

The Council also requests that a summary document is produced showing why underground cabling is not possible, giving examples of the cost of underground and overhead for the South Norfolk part of the route for the benefit of our residents and business.

The Council maintains its stance that we are not satisfied that the project in its present form is the most appropriate solution to National Grid's need for increased capacity due to the significant detrimental impact on our open landscapes, heritage assets, wildlife sites, economy and wider environmental life of our district.

In view of the above and still in the absence of a fuller justification regarding why a strategic offshore approach to deliver the network reinforcement objectives of this project are not forthcoming the Council maintains its **objection** to the proposed development at this time.

Main Technical Issues/considerations

Should 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 Secretary of State will need to robustly consider.

Given the stage the project is at, the technical information is still limited, the following are the main issues the Council would like to raise and wishes to reserve the right to raise other issues as the project moves forward to the Statutory public consultation. Equally, the below comments should be taken together with the formal comments the Council provided under the first non-statutory consultation.

Impact on Heritage Assets

The Council's Senior Heritage and Design Officer has given further preliminary consideration to the route and potential impacts on Heritage Assets:

The National Grid has produced an EIA technical Note on the approach to the Heritage section and he is in agreement with the methodology outlined for carrying out the heritage assessment to assess impact on heritage assets.

There are some concerns raised by the information supplied with the current public consultation showing the proposed cable route and location of pylons and the likely impact on designated heritage assets, and he therefore has some additional comments to make, however these are made with the understanding that the EIA Heritage Impact Assessment has yet to be produced.

Proximity of pylon tower to Kenningham Hall Farm Grade II listed

<https://historicengland.org.uk/listing/the-list/list-entry/1373056?section=official-list-entry>

The farm although set back from the road to the north, has approaches to the west and east along Brick Kiln Lane and the farm outbuildings are clearly visible within their rural context when approaching from the east. With the height of the pylon and its close proximity to the lane, the pylon tower will have a dominating presence and he would suggest should be better positioned away from the road and these views, i.e. further to the south or further north if staying in this location.



Impact of wires and pylons on Flordon Hall – Grade II*

This concern has been previously raised. The hall is listed Grade II* and is therefore of particular importance and more than special importance. There are good views of the hall from Long Lane to the east of the E plan house which faces East, and the pylons and wires will be clearly visible and have an intrusive presence when seen within the backdrop of this setting. This will harm and detract from the preserved historic setting of the hall within open countryside and will likely result in a higher degree of harm.



Proximity of pylon tower and cables to Heywood Manor – Grade II

<https://historicengland.org.uk/listing/the-list/list-entry/1049736>

This house dates back to C17 and also has a moat so a long established isolated manorial site within open countryside. Although Grade II it is historically of quite high significance and the isolated rural setting contributes to that significance. The approach to the house is from the northwest – and includes crossing a bridge over the moat. A pylon and the wires are in close proximity to the listed building and with the height of the pylon it is likely to have quite a dominating and very visible/detracting impact on the setting of the listed building resulting in a likely higher degree of harm.



The Council wishes to continue to be engaged with National Grid to ensure that an onshore proposal, minimises its impact on our heritage assets, of which South Norfolk has a significant number of and refined routing will be expected.

Impact on Ecology

The Council's Ecologist has commented as follows, and in addition to her previous comments:

The Biodiversity Chapter of the Environmental Impact Assessment (EIA) must be completed in line with industry guidelines and completed by suitably qualified and experienced ecologists.

Ecological Surveys

The application must be supported by **up-to-date** desktop and ecological surveys. Surveys of the route and suitable buffer must be completed by suitably experienced/licensed ecologist in line with best practice guidance. The surveys will be expected to inform the proposed route including any micro siting, and mitigation/compensation and enhancements. A **full UKHab survey** for the project is expected.

Consideration should be given to the location and extent of **INNS** (invasive non-native species) and any required biosecurity measures.

There are concerns about impacts on **badgers** in the Norwich Sub Station area due to cumulative impacts with other developments. Although not undertaken for previous projects there has been a substantial increase in development in this area. It is requested that **bait marking** studies for badgers are requested to provide a detailed understanding of the potential impacts on badgers and to ensure that mitigation/compensation measures and enhancements are suitable.

Designated Sites

The alignment avoids national and internationally important designated sites although, as previously noted, it will pass close to several statutory and non-statutory designated sites. Indirect impacts, including those to breeding/wintering and migratory birds, will need to be considered, in combination with the existing overhead line. Evidence needs to be provided regarding the Zones of Influence which need to consider the ecology of the receptors.

Impacts during site preparation, construction, and operation should be considered.

Habitats/Irreplaceable habitats

It would be anticipated that micro siting will be required to avoid, for example, irreplaceable habitats areas/features of ecological interest (e.g. veteran/ancient trees). This will need to be informed by detailed UK habitat surveys and arboricultural surveys submitted as part of the examination. The Ancient Woodland Inventory (AWI) is a suitable tool for identifying ancient woodland greater than 2ha. A field survey is required to identify potential ancient woodland less than 2ha that is not recorded on the AWI.

Impacts from the development

Impacts during site preparation, construction, and operation should be considered.

Where associated infrastructure requires security lighting consideration will need to be given to impacts on the nocturnal environment and measures to minimize impacts put in place. These measures should adhere to best practice guidance.

Protected Species Licensing

Letters of No Impediment (LONI) and countersigned Impact Assessment Conservation Payment Certificate (IACPC) and Natural England's red line map will need to be submitted as part of the DCO. Please note that protected species surveys will need to be relevant and recent at the point of full license submission (updated surveys may be required).

Consultations re Pink Footed Geese

We would advise the applicant to engage in early discussions with Natural England with regards to Pink Footed Geese as there are ongoing discussions associated with Hornsea Three, and Sheringham Shoal/Dudgeon Wind Farm Extension Projects. Avian collision risk/electrocutions should be considered. The RSPB should also be consulted. Norfolk Wildlife Trust, the Royal Society for the Protection of Bird (RSPB) should also be involved in any pre-application discussions.

Biodiversity Net Gain

Biodiversity Net Gain (BNG) ensures development contributes to the recovery of nature. From November 2025 Nationally Significant Infrastructure Projects will be required, under the Environment Act 2022, to deliver BNG (subject to consultation).

Should the Development Consent Order application be submitted prior to November 2025 it is requested that the application utilizes the statutory metric to demonstrate how the proposal will deliver, secure, and manage biodiversity net gains in line with legislative requirements (i.e. at least 10% for at least 30 years). The application will also need to demonstrate how it has avoided, mitigated and compensated for impacts. If irreplaceable habitats are impacted biodiversity net gain cannot be achieved.

Consideration will need to be given to existing/proposed schemes within the Norwich Main substation area to ensure that bigger, better, and more joined up green and blue habitats are created. Where BNG is offset justification should be provided and any offsetting should ideally occur within the Parish and District. Consideration should also be given to the Local Nature Recovery Strategy should this be published in time. South Norfolk Council is also commissioning a Biodiversity Baseline Study which should be considered.

The DCO application should be supported by a Biodiversity Gain Plan, a copy of the statutory metric (Excel) and condition assessment sheets. The BNG shall be informed by a full Habitat Survey undertaken by appropriately qualified and experienced ecologists.

Biodiversity Enhancements: Planning Policy

In addition to habitat creation/enhancement delivered as part of Biodiversity Net Gain, the proposal will also be expected to deliver biodiversity enhancements (such as creation of reptile habitat, hibernacula, and log piles) in line with national and local planning policies (DM 1.4 and 4.4 of the South Norfolk DPD). Enhancement should prioritize protected species and species of principal importance.

Habitat compensation and enhancement should use locally sourced native species. Consideration could also be given to natural regeneration where appropriate e.g. next to deciduous woodland and restoration of ghost pond.

Impact on Landscape

The Council's Landscape Architect has commented as follows and should be taken together with the previous comments made:

Further to its previous objection, the Council remains concerned by the potential visual and landscape effects of the proposals. Whilst the proposed pylons' locations are now indicated, we are unable to comment in detail until the full implications of the siting can be understood; this will require availability of information such as a full Landscape and Visual Impact Assessment. Furthermore, the implications of construction-related access, structures and activities, and future maintenance access and operations need to be fully assessed.

The Council is also concerned about potential direct and indirect implications for existing trees and hedgerows. It is to be noted that, whilst trees and woodlands that are subject to protection and restrictions by tree preservation orders, conservation areas, and the Hedgerows Regulations will not be the only ones that are of note and/or worthy of detailed consideration. Full regard must also be given to any consequential management implications (such as operational clearances) for existing habitats – especially trees and woodlands – within the vicinity of the route should it be implemented.

As set out above, the Waveney River 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.

Environmental protection

The Council's Environmental Management officer has commented as follows:

Contaminated land

The application should be accompanied by a Phase 1 desk study which details all potentially contaminated sites which will be impacted by the project. All sites which are identified should be investigated with a suitably designed site investigation, including chemical analysis of representative soil and water samples.

The results should be assessed as to their impact on identified vulnerable receptors. If a potential risk is identified, then a detailed quantitative risk assessment should be undertaken to assess the risk to the identified receptors. All assessments should be undertaken in accordance with 'Land Contamination Risk Management'.

Air Quality

An air quality assessment should be undertaken to determine the impact of the development on the ambient air quality. The assessment should include the cumulative impact from all large-scale developments being undertaken in the area where works will be undertaken.

Electromagnetic Frequency Radiation

A detailed assessment on the electromagnetic radiation produced, and its impact on the public, by the proposed project should be undertaken and submitted. This should also include the cumulative impact of the existing cable pylons and the proposed pylons.

Noise, Vibration, Dust and Light

A detailed assessment will be required to be provided which will provide specific details of the works. These are to include but not be limited to:

- Noise
 - Provide detail of the proposed working hours.
 - Identify all potential vulnerable receptors which could be impacted by the proposed works.
 - The types of vehicles, machinery, and operations to be undertaken and their related noise impact.
 - The calculated noise impact which the identified vulnerable receptors would be subjected to.
 - Provide details of specific noise mitigation measures which are required to prevent noise nuisance.
 - Provided details of the adopted complaints process and how it will be implemented.
 - The agreement that any works considered to be required to be undertaken outside of the stated working hours will be agree via a Section 61 agreement.
 - Details of how any emergency works will be undertaken and who will be contacted.
 - The assessment should be undertaken in accordance with BS 5228 Part 1.
 - The compounds should be assessed for their noise impact. Given the length of time which the compounds are potentially in place they should be assessed under BS4142.
 - An additional assessment should be undertaken regarding operational noise generated by any infrastructure which will be constructed as part of the proposal. This should be assessed using BS4142
- Vibration
 - Provide detail of the proposed working hours.
 - Identify all potential vulnerable receptors which could be impacted by the proposed works.
 - The types of vehicles, machinery, and operations to be undertaken and their related vibration impact.
 - The calculated vibration impact which the identified vulnerable receptors would be subjected to.
 - Provide details of specific vibration mitigation measures which are required to prevent noise nuisance.
 - Provided details of the adopted complaints process and how it will be implemented.

- The agreement that any works considered to be required to be undertaken outside of the stated working hours will be agreed via a Section 61 agreement.
- Details of how any emergency works will be undertaken and who will be contacted.
- The assessments should include all works including the compounds as well as the locations of the pylons.
- The assessment should be undertaken in accordance with BS 5228 Part 2.
- Dust
 - A detailed assessment should be undertaken regarding all the works to be undertaken and their potential to produce dust.
 - Provided details of all vulnerable receptors.
 - Provide details of mitigation measures to be enacted to limit the impact on all receptors.
 - The assessment should be undertaken in accordance with the Institute of Air Quality Management Guidance document: Guidance on the assessment of dust from demolition and construction V1.1.
- Light
 - All proposed lighting should be assessed in a report which provides details of all lighting which is proposed to be installed. This is to include the compounds and locations of the pylons and any other locations where lighting is proposed.
 - The report should include details of how the lighting will be installed to minimise light nuisance on identified vulnerable receptors.
 - The report should be undertaken in accordance with the Institute of Lighting Professionals Guidance: The Reduction of Obtrusive Light 01/21.

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 continues to have concerns that the proposal will have a detrimental impact on established businesses in the district.

We previously raised concerns regarding Bressingham Steam Museum and gardens. It is noted that the route has been realigned, to reduce the impact on this business and visitor attraction, The Council expects National Grid to have continued engagement with the Bressingham Steam Museum to resolve any outstanding issues.

The Council is increasingly becoming concerned at the potentially serious implications this proposed development would have on a number of airfields. Directly affected are Tibenham Airfield and Priory Farm, however there could be also implications for other airfields within the locality too.

The proposed pylon route sits to the west of the two airfields Tibenham and Priory Farm and the existing pylons sit to the east, resulting in the airfields being sandwiched between overhead lines and lattice pylons. The addition of the proposed pylons, the Council understands, will effectively prevent aircraft taking off safely, thereby resulting in those two

airfields not being able to function. The loss of these local businesses and facilities is an unacceptable consequence of National Grid's proposals.

Tourism and visitors

South Norfolk with its market towns of Diss, Harleston, Loddon and Wymondham; numerous heritage assets including Saxon and Norman Churches; the Waveney Valley; Boudicca Way; museums; walking and cycling routes for example, provides a rich tourism/visitor offer. National Grid therefore need to fully assess the impacts the project infrastructure would have on the known features, both directly and indirectly.

The Council wish to reserve its right to comment further once the route becomes clearer at the Statutory consultation stage.

In addition to Tibenham and Priory Farm, there are other airfields at Seething and Old Buckenham for which additional consideration should be given.

Bringing Power into Norfolk

The Council wish to reiterate that 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 requests that National Grid commit to providing a Community Benefit Options (mindful of the emerging requirements in the anticipated community benefit guidance subject to recent consultation). The Council is happy to discuss potential coordination with other projects and wish to seek localised benefits to South Norfolk communities to offset the significant impacts the project will create.

Cancellation of Norfolk Boreas

During the life of this consultation, the very substantial Norfolk Boreas offshore wind farm array promoted by Vattenfall has been shelved. This Council's view is that the hiatus caused by this delay provides an opportunity for National Grid to reflect on the points raised above in a more measured manner, unpressurised by time constraints, and to revisit the proposals with a more open mind as to the various potential options and consult more widely, with sufficient information and at a time of year when it is possible to engage with interested parties more effectively.

Yours sincerely

A handwritten signature in blue ink that reads "Helen Mellors". The signature is written in a cursive style with a horizontal line underneath the name.

Helen Mellors

Assistant Director – Planning

South Norfolk Council

e: helen.mellors@southnorfolkandbroadland.gov.uk

Simon Pepper
Senior Project Manager,
National Grid.
By email: simon.pepper@nationalgrid.com

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Date: 6 July 2023

Dear Simon

Norwich To Tilbury, Nationally Significant Infrastructure Project - National Grid consultation

Thank you for the briefing sessions that National Grid have facilitated for Norfolk members on Monday and Tuesday of this week to outline the Norwich to Tilbury project and the second non-statutory consultation.

I wish to reiterate the concerns raised during the briefing on Monday regarding this second non-statutory consultation.

The 8 weeks consultation period running from 27 June to 21 August is during peak holiday season, harvest time and when Parish Councils do not meet, which will make it difficult for our residents, businesses, and Parish Councils to engage and submit formal comments with their views regarding the project, which will have a significant impact upon them.

This second non-statutory consultation provides your preferred route of the pylons, which shows the siting of the pylons in detail giving residents, businesses, and Parish Councils a greater understanding of their specific location, time is therefore needed for due consideration to be given to this new information and the impacts the pylon siting will have.

In light of the above I consider it only fair and reasonable for the consultation period to be extended until the end of September, to enable full engagement to take place.

Concern was raised under the last consultation by the Council that the only public event that was held for the whole of South Norfolk was in Mulbarton, restricting the ability of our residents to be able to attend a face-to-face event. This inadequacy

when taken with the limited timeframe of this second non-statutory consultation of only 8 weeks over the summer, (if not extended) would be likely to be raised by the Council when we are consulted by the Planning Inspectorate to confirm whether we consider that National Grid has complied with its duties under the Planning Act 2008 at the Adequacy of Consultation stage.

Whilst South Norfolk Council remains fully committed to our net-zero ambitions; recognise the importance of the diversification of UK energy supplies; the reduction of the UK's reliance on imported energy and ongoing energy security, we strongly believe there should be a greater level of scrutiny and consideration given to an off-shore transmission option. A greater balance needs to be reached to enable the infrastructure to be provided to accommodate the new energy generation, without the resulting significant detrimental impact on our residents, businesses, and the local environment, that the on-shore overhead lines and pylons will unquestionably cause.

I also consider that National Grid should produce a summary document showing why underground cabling is not possible, giving examples of the cost of underground and overhead for a certain area that South Norfolk residents would know rather than for the scheme as a whole.

As proposed, it is considered that the Norwich to Tilbury project will have a significant detrimental impact and the imperative of getting electricity to market should not be at the expense of what makes South Norfolk special – its open landscapes, heritage assets, wildlife sites, its growing economy, and residents.

I look forward to receiving your comments on the above along with confirmation that the non-statutory consultation will be extended and the date which the consultation period will be extended to.

Yours sincerely

A handwritten signature in black ink, appearing to read 'L Neal'.

Cllr Lisa Neal
Cabinet Member for Stronger, Greener Economy
South Norfolk Council

Simon Pepper
Senior Project Manager
National Grid

Sent via email simon.pepper@nationalgrid.com

17 July 2023

Dear Simon

Norwich To Tilbury, Nationally Significant Infrastructure Project - National Grid Consultation

We write in respect of the above infrastructure project and the second non-statutory consultation which National Grid has opened to anyone wishing to comment on the Norwich to Tilbury proposal, (previously known as East Anglia GREEN). The project will see a new 400kV electricity transmission line built between Norwich and Tilbury, running a distance of 111 miles. It will be made up of overhead line and pylons running through South Norfolk Council Executive Area from Norwich Main to the east of the district crossing the River Waveney, into Mid Suffolk.

Norfolk as a County has already been subject to a number of consented and proposed Off-Shore Windfarms, Nationally Significant Infrastructure Projects, making land fall on the North Norfolk coast cable routes running through North Norfolk and Broadland connecting into Necton within Breckland and cable routes and connection into Norwich Main within South Norfolk which are having a significant challenging impact on the County.

Whilst we remain fully committed to net-zero ambitions; we strongly believe there should be:

A greater level of scrutiny and consideration given to an off-shore transmission option. There has, to date, been no meaningful data presented for an offshore solution for this area, the information in the media about other projects look to be both real and having advantage over the current detrimental proposal and we urge you to consider an off-shore solution for this area. A greater balance needs to be reached to enable the infrastructure to be provided to accommodate the new energy generation, without the significant detrimental impact on our residents, businesses and the local environment, that the on-shore overhead lines and pylons will cause.

We remain particularly challenged by the damage to the Norfolk countryside which will for instance see Diss (a South Norfolk Market Town) entirely surrounded by pylons and will destroy Areas of Outstanding Natural Beauty. The current proposed arrangements are made at the expense of Norfolk and what makes it special, its open landscapes, heritage assets, and wildlife sites.

The consultation period provides insufficient time for respondents, the timeline is both at the peak holiday season and at the heavy harvest period when our

regions producers are at their busiest time. We urge you to reconsider your consultation period to allow residents and businesses proper time to consider.

The consultation does not provide any options, being offered just one choice does not allow for consideration of opinion, it presents a solution, how are people able to respond if only one solution is provided. We would like to see a range of options which our residents can consider and respond to, for instance, if you are going underground in some parts why not others? If you are going off-shore for some areas why not all?

This proposal is a detrimental proposal for Norfolk, whilst destroying the countryside. Norfolk will not benefit from ANY of the electricity this project is generating. The future development of Norfolk is significantly challenged by the absence of power in our area. Norfolk is receiving ALL of the negative impacts whilst receiving not ONE positive.

We disagree with this proposal in the strongest terms and ask that you reconsider; what we consider to be a disastrous project for our residents and the growing economy in Norfolk.

Yours sincerely

Norfolk Leaders



Cllr Terry Parish
Leader of the Borough of King's Lynn &
West Norfolk



Cllr Tim Adams
Leader of North Norfolk District Council



Cllr John Fuller OBE
Leader of South Norfolk Council



Cllr Sam Chapman-Allen
Leader of Breckland District Council



Cllr Carl Smith
Chair of Norfolk Leaders' Group and Leader of
Great Yarmouth Borough Council



Cllr Mike Stonard
Leader of Norwich City Council



Cllr Susan Holland
Leader of Broadland District Council