



## Adequacy of Consultation Representation Proforma

Under *Section 55(4)(b) of the Planning Act 2008 (PA2008)* the Planning Inspectorate, on behalf of the Secretary of State, must take any adequacy of consultation representation (AoCR) received from a local authority consultee into account when deciding whether to accept an application for development consent, and this will be published should the application be accepted for examination.

An AoCR is defined in s55(5) in PA2008 as “a representation about whether the applicant complied, in relation to that proposed application, with the applicant’s duties under sections 42, 47 and 48”.

<b>Project name</b>	Norwich to Tilbury
<b>Date of request</b>	1 September 2025
<b>Deadline for AOCR</b>	15 September 2025
<b>Return to</b>	<a href="mailto:NorwichToTilbury@planninginspectorate.gov.uk">NorwichToTilbury@planninginspectorate.gov.uk</a> To Sian Evans Case Manager

Please complete the proforma outlining your AoCR on the above NSIP.

<b>Local Authority</b>	Norfolk County Council
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In the opinion of the local authority, has the applicant complied with the legislative requirements listed below?

*Please note that this is specifically about the statutory consultation(s) undertaken.*

<b>Assessment of Compliance - Required</b>	
<b>S42 Duty to consult</b>	Yes
<b>S47 Duty to consult local authority</b>	Yes
<b>S48 Duty to publicise</b>	Yes

If you would like to give more detail on any of the above, please do so below.

*Please keep it as succinct as possible and refer to facts and evidence related to consultation, rather than the merits of the application.*



Additional comments - <i>Not compulsory</i>	
<b>S42 Duty to consult</b>	No further comment
<b>S47 Duty to consult local authority</b>	No further comment
<b>S48 Duty to publicise</b>	No further comment



<b>Any other comments</b>	<p>The applicant had undertaken consultation under S42 of the 2008 Planning Act in Spring 2024 and that was considered to be “adequate” by the County Council.</p> <p>Notwithstanding the above it should be noted that the County Council maintains its objection to the Project as raised at Planning and Highways Delegations Committee on 10 June 2024; and further concerns raised in its response (20 February 2025) to the Targeted Consultation (undertaken by National Grid).</p> <p>As part of the County Council’s original response (June 2024) it was felt that National Grid should pause its Proposed Application and consider the alternative transmission options outlined in a study (March 2024) undertaken by the Electricity Systems Operator (ESO). Further details on this matter will be provided as part of the County Council’s relevant representations to the submission Development Consent Order (DCO).</p> <p>While not all the options set out in the ESO study had been considered by National Grid, it is accepted and recognised that they have assessed a range of alternative options including: an offshore alternative; and an undergrounding alternative; and have dismissed both alternatives on the grounds of cost and technical matters.</p> <p>Notwithstanding the County Council’s serious concerns regarding the merits of the project, the consultation is considered adequate.</p> <p>The County Council has not and does not consider it necessary or proportionate to undertake any further assessment of the Applicant’s compliance with the public law principles of consultation in respect of the adequacy of consultation at the pre application stage. The County Council understands that the Applicant has a duty to take into account responses to consultation and publicity and that the Secretary of State must have regard to the consultation report which gives details of the relevant responses and account taken of those responses</p> <p>The County Council is aware that there are a number of objectors to this project; and some feel that they have not been consulted adequately nor has there been sufficient engagement with them. For example the Norfolk Gliding Club who operate from Tibenham Airfield do not consider there has been sufficient engagement with them during the above statutory stages; as a result aircraft safety matters have not been resolved to the satisfaction of the Gliding Cub.</p>
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