



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”.

Project name	Norwich to Tilbury Project
Date of request	01 September 2025
Deadline for AOCR	15 September 2025
Return to	NorwichToTilbury@planninginspectorate.gov.uk

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

Local Authority	South Norfolk District 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.

Assessment of Compliance - Required	
S42 Duty to consult	Yes
S47 Duty to consult local authority	Yes
S48 Duty to publicise	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>	
S42 Duty to consult	
S47 Duty to consult local authority	<p>As stated in the consultation report, the Applicant has engaged with the Local Planning Authority since 2021 before the first stage of non-statutory consultation in 2022.</p> <p>It undertook 3 non-statutory consultations and 1 Statutory consultation. As part of the consultations, National Grid has held regular host authority workshops; thematic/topic-based workshops; South Norfolk District Council Member briefing sessions (to introduce the project and prior to the various consultations) and in addition, had regular meetings specifically with South Norfolk District Council throughout the pre-application period.</p>
S48 Duty to publicise	
Any other comments	<p>The consultation documentation inaccurately refers to “South Norfolk and Broadland Council” as the host authority. The correct designation is South Norfolk District Council.</p> <p>The Council, having due regard to the Guidance ‘Planning Act 2008: Acceptance stage for Nationally Significant Infrastructure Projects’ brings to the attention of the Planning Inspectorate that concerns have been raised by local communities regarding the adequacy and fairness of the consultation process. These concerns include:</p> <ul style="list-style-type: none">• Alleged failure to comply with the Gunning Principles, particularly:<ul style="list-style-type: none">• The project was presented as a single preferred option, limiting meaningful engagement and precluding genuine consideration of alternatives.• Insufficient information was provided to enable lay consultees to make an informed comparison between the preferred option and alternatives with fewer or no pylons.• The rationale for discounting alternatives was not transparently shared, undermining the public’s ability to scrutinise or advocate for other options. <p>These issues were raised by Lord Charles Banner, KC on behalf of the Essex, Suffolk, Norfolk pylons campaign group, and reflect a broader concern about the transparency and inclusivity of the consultation process.</p>