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By email:
NorwichToTilbury@planninginspectorate.gov.uk

Our ref: PEA3/2

Your ref: EN020027

15 September 2025

Dear Sirs

National Grid's DCO application re Norwich to Tilbury transmission line

1. We write to raise serious concerns about the above which PINS is being asked to accept by National Grid. As explained below, the process to date has been unlawful and so PINS should not do so.

Background

2. We represent the Essex Suffolk Norfolk Pylons action group (aka Pylons East Anglia Ltd), an umbrella community group representing residents the length of the Norwich to Tilbury route. ESNP has tried to engage constructively with NG over the full series of consultations since 2022 working to shape a scheme which meets need but reduces harm, submitting detailed and evidence-led papers at each stage, often supported by professionals. ESNP has 40,000 supporters, and committee members live across Norfolk, Suffolk and Essex.
3. We see from NG's and your websites that NG submitted a DCO application for the project on 29.8.25. This awaits consideration as to its acceptability by PINS, to be decided within 28 days of submission.
4. We have not seen it, so obviously cannot comment on what was submitted. However, ESNP has kept a close watch on this matter and is concerned that the application may be defective for reasons that may not be immediately obvious to PINS. So, we are writing now to raise these concerns, and to ask PINS to note ESNP's interest.
5. We want to stress at the outset that ESNP is fully in favour of necessary additions or upgrades to NG's systems. They support that national interest. They would like to see whatever is to be done carried out efficiently and expeditiously and if possible sooner than NG plan. They do not seek to have the DCO procedure frustrated by any sort of unnecessary delay.

6. However, that could occur if there is an issue as to the current application which is not picked up at this stage. Conceivably, s.118 Planning Act 2008 is not clear, concerns might have to wait until after the DCO for any challenge to acceptance of an application (compare s.118(3) applying where an application is rejected). In any event, it is clearly in everyone's interest that matters are sorted out expeditiously, hence writing to you now.

Concerns

7. ESNP's central practical concern is that NG appears set on the project involving the transmission of AC power on an overland pylon route (with some limited AC undergrounding) from Norwich to Tilbury. That decision appears to have been refined over a series of consultations as set out in detail in NG's June 2025 report Adequacy of Consultation Milestone which presumably accompanies the application for the DCO recently presented to PINS.
8. As a matter of law this approach is seriously defective owing to the way the consultation has progressed. What we explain below as unlawful predetermination is likely also unlawfully to be reflected in the environmental statement (ES) accompanying the application.
9. In writing this, we have had careful regard to EN policy statements, in particular EN-5 covering electricity networks infrastructure. We note for example EN-5, 2.2.10:

As well as having duties under Section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and ... do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.

10. Also, the need for NG to consult on and/or demonstrate how they have upgraded the existing grid using grid enhancing technology before building new lines, as in EN-5 2.10.5

consideration of network reinforcement options (where alternatives exist) which may allow improvements and/or extensions to an existing line rather than the building of an entirely new line;

11. The concerns about the proposed overhead pylon line relate to the short- and longer-term effects on the environment of the path that it passes through. There is also limited short-term concern associated with disruption from construction, and at an individual level about effects on properties, which under current rules (Land Compensation Act

1973) are not, other than in relation to land-take and wayleave, subject to compensation. However, the much broader concern, which unites our client group, is that the proposals do not address the underlying requirement for upgraded infrastructure in an appropriate way, and in turn that is reflected in a failure of consultation. They wish to see the best solution from a national interest point of view, and that is not what NG is doing.

12. There is a mass of documentation produced by NG which relates to the consultation it has done. ESNP and individuals within the group have also carefully monitored their experience of the consultation process. Put shortly, the consultation, and this is the key legal error which needs correcting now, relates to a project which has been pre-determined before consulting in a lawful manner on the key question, namely “what in principle is the best way forward in the national interest?”.
13. The task facing NG is summarised in its Preliminary Information Report non-technical summary:

1.3.2 National Grid is proposing to reinforce the high voltage power network in East Anglia. The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which is generated by offshore wind) that is expected to connect to the network over the next ten years and beyond. Completion of the Project, together with other new reinforcements across the country will meet this future energy transmission demand both in East Anglia and across the UK.

1.3.3 The Project proposes to reinforce the transmission network between the existing substations at Norwich Main in Norfolk, Bramford in Suffolk, and Tilbury in Essex as well as connecting new offshore wind generation and an interconnector proposed to come ashore on, or in the vicinity of, the Tendring Peninsula via connection into a new 400 kV East Anglia Connection Node (EACN) Substation.

...

1.5.2 New connections for new offshore wind and nuclear power generation projects and for interconnectors into East Anglia are expected to continue. These new connections are being constructed or are expected to connect into substations at Necton, Norwich Main, Bramford, Friston and Sizewell. Additionally, agreements are in place with two offshore wind farm projects and an interconnector based on their connections into a new EACN Substation. National Grid has a duty to facilitate new connections and maintain a safe National Electricity Transmission System (NETS) and has considered the capability of the existing network to support such connections.

...

1.5.4 As a result, and to comply with its duties, National Grid needs to reinforce the electricity network to allow power to be imported to and exported from East Anglia. The reinforcement would provide additional capability to connect

to areas of demand, allowing power flows across boundaries, and linking interconnectors to and from Europe.

1.5.5 The Project could also connect new offshore wind farms off the Essex coast and a European interconnector to the electricity transmission network. Two offshore wind farms, the North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm, and the Tarchon Energy Interconnector (from Germany) are currently in development.

14. The above is to the effect that the proposed project is a part of a much wider requirement to increase the capability of the grid in the East Anglian region, including in particular to enable transmission of power from offshore sources as well as overseas. It is not a project which is properly seen, nor would it have been conceived, simply to improve transmission of power from Norwich to Tilbury.
15. With that background, it is extraordinary, and as a matter of law unacceptable, that NG has pursued the project as if the latter. Put simply, the consultation should have laid out the problem that NG needs to address and set out the various ways in which its obligations could be managed.
16. Clearly there are other options which could and should have been set out to that effect. In summary these included (and still could) establishment of an offshore grid and/or, to the extent transmission through East Anglia is required, using undergrounded High Voltage Direct Current (HVDC) cables approximately in the corridor proposed for the project as currently conceived. Considered with the various offshore connections which will be HVDC, such alternatives must at least have been options to consider and seek views upon. There would no doubt be combinations of options to consider, including an entirely offshore cable. You will note from the County Council submissions below that underground HVDC was specifically submitted, and with detailed evidence, as an option that NG should consider, but in effect with no response. Clearly rounds of lawful consultation would have involved (at least) NG explaining why it considered it inappropriate but inviting views.
17. If there were a need for a land-based corridor, a further specific advantage of HVDC is that this has a much narrower corridor width than HVAC where that must be undergrounded. This is relevant to the (accepted) obligation to go underground in the Dedham Vale National Landscape, where a narrow corridor would be more consistent with NG's duties under amended s.85 Countryside and Rights of Way Act 2000.
18. The need to deal with other options as part of the consultation process has been raised with NG but not acted upon. NG has clearly predetermined the route for which it now seeks a DCO, and that is unlawful. It can and should arrive at the best option to go through the DCO process starting with a lawful consultation.
19. This predetermination also infects (or is infected by) pre-determination as to location of various connector stations.
20. ESNP has as above attempted throughout the process to point out to NG that its

approach is flawed, but it has taken no notice.

The legal position

21. ESNP does not instruct us lightly to write as we do now. It has acted throughout on the advice of leading counsel (Lord Banner KC) and we have ourselves also reviewed the history of events.
22. Principles regarding the adequacy and fairness of consultation are well established. The most recent leading case to review them was R (Moseley) v. LB Haringey [2014] 1 WLR 3947. Consultation must be at a formative stage, and the proposer should give reasons for its proposal to enable intelligent consideration and response. Fairness will thus require at least sufficient reference to other options, such that consultees may properly consider them and comment as to whether they have been properly discarded, and the proposer must conscientiously take into account any responses. These are often referred to as “Gunning principles” (see R v Brent LBC exp Gunning (1985) 84 LGR 168). Overall, while it may not be wrong for a project proposer to say what it prefers, the starting point in consultation must be to provide information to consultees about other options and take into account what they say about them.
23. In this case, in the first round of consultation in 2022, NG made it clear that it was consulting only on its preferred option. Its website said:

The project is still at an early stage of development and this public consultation will give local communities the first opportunity to see the plans and to provide feedback. National Grid will listen carefully to the views of local people and will take their comments into consideration as they develop the proposals in more detail. There will be another opportunity to comment on the proposals before National Grid submits a planning application to the Planning Inspectorate in late 2024.

...

During our public consultation, we are asking for your feedback on our preferred route corridor and graduated swathe and the preferred location of the new substation in Tendring District in order to identify and understand the views and opinions of stakeholders and communities that may be affected by our proposals.

24. Thus, despite the protestation above that the project is “still at an early stage of development”, a single preferred route corridor option was being consulted upon. Alternatives (as outlined above, and indeed other route options for a pylon line) had already been discounted by NG. NG’s website explained:

“Why did we present a preferred corridor option at this consultation?”

There are often a number of different ways that we could satisfy the need for a new connection, perhaps involving different locations, technologies or designs. Each time a new connection is needed, we have to make judgements

about the best way to achieve it.

In most cases a single preferred option will be identified. However, where it is not possible or appropriate to narrow down the selection to one preferred option, then more than one option may be taken forward. One option may perform better on technical and environmental grounds than another, but at much higher cost. In those cases, we need to make a judgement as to whether the additional benefits of the more expensive option justify the additional cost.

Prior to our non-statutory consultation a number of strategic and routeing options for East Anglia GREEN were identified and evaluated. These options were identified as being appropriate to achieve the required reinforcement and included consideration of onshore routes, offshore and subsea options.

We will generally consider options to have an advantage if:

- we can use or adapt existing infrastructure, or where we can negotiate different commercial arrangements with our customers to achieve a need, rather than building new infrastructure
- they are shorter, compared with longer routes
- they are financially less expensive compared to other more expensive options
- they avoid or mitigate environmental or socio-economic impacts.

We then compared the technically feasible options to inform the selection of preferred option(s).

The option we have taken forward best meets the technical and physical/geographical constraints and enables the network to operate to the required standards. More information on these options and the process of consideration can be found in our Corridor Preliminary Routeing and Siting Study, available to view here - <https://www.nationalgrid.com/electricity-transmission/document/142461/download>.

We will continue to back-check and review the performance of all our options at each stage of our proposals to understand if there has been a material change.

25. We have carefully considered the preliminary routeing study (CPSSS) linked as above. It explains how NG got to consider (from a multiplicity of possibilities) what it calls the Strategic Proposal and an onshore route for transmission from Norwich to Tilbury as part of that. What it did not do, and fatally, is consult on other options for the latter, for example as above underground HVDC, an offshore route, an integrated offshore grid, and so forth. We note brief (but otherwise unexplained/set-out) mention of an offshore option in the CPSSS report, but otherwise no mention (other than some mention in Table 1.2) of underground HVDC and/or an integrated offshore grid, let alone consulting on them.
26. We also note the reference to “back-check”. There have been three stages of consultation and at no stage (most obviously between the first and second non-

statutory consultations) has NG gone back to consultees to the effect that it has noted concerns raised about the preferred option and taking the opportunity to explain in more detail while it remains such, including setting it out in more detail why the other options are not preferred.

27. Overall, the consultation has proceeded when the proposals were not at a formative stage. If it be said that other possibilities are mentioned, the information provided cannot possibly be said to enable consultees to give the consultation “intelligent consideration and response” as required by law.

Other concerns

28. There are some related points.
29. Other overhead routes. Although we have mainly referred to consultation on NG’s preferred route versus HVDC underground, offshore grid etc., similar concerns can be raised directly as to failure to provide information on/predetermination on the other possible pylon routes.
30. Local authority responses. We note that NG has set out at length responses from local authorities in its June 2025 report on the adequacy of consultation. We note that some of the authorities express serious reservations as the consultation stands, which of themselves require further work from NG. None deal with the fundamental points we raise, and cannot be seen as an endorsement of NG in that respect. Indeed, we would be surprised if that could be said to be the case as the County Councils at least have long expressed concern about failure to adhere to the principles we mention above. Our clients have compiled a detailed compendium of points made by Essex, Suffolk and Norfolk County Councils and you will see that this is a recurring theme. It may be that the letters which you print in the Adequacy of Consultation document are focusing on the statutory provisions in the abstract, rather than the underlying common law rules which inform the interpretation and application of those provisions. In any event, we ask that you consider the compendium carefully. It will we trust convince you that the concerns we express above are not confined to ESNP.
31. Environmental statement requirements. Third, we suspect (though do not know, because we have not yet seen it) that the deficiencies mentioned are reflected in the ES presented with the application for the DCO. This requires (see Regulation 4(2) of (d) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017):

"A description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account of the effects of the development on the environment".
32. We note from the underlying EU directive and equivalent transposition into other planning legislation the requirement is more expansively put:

A description of the reasonable alternatives (for example in terms of project

design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

33. Treasury Green Book. We are aware that NG has rejected application of the Treasury Green Book (2022). We have considered the legal position carefully and are satisfied this is simply wrong in law, such that taking the matter forward without applying the Green Book would of itself undermine any DCO. A key element of TGB guidance is that it sets out how to long list and then subsequently short list project options to optimise the selection and rejection of alternatives. That process has not happened here. We also believe that failure to follow TGB guidance has led to mis-costing of the project apparently towards a result favoured by NG.
34. Crow Act 2000 as amended. We are unaware of NG considering let alone consulting on the implications of the updated s.85 CROW Act 2000 in relation to the proposed line passing through the Dedham Vale AONB (now National Landscape). Put shortly, this arguably mandates, if it is essential to go through this area at all, as narrow a path as possible. In turn that would require HVDC cables, and importantly for present purposes therefore of itself requires consideration of whether there should be converter stations on each side of the NL, or whether in fact a HVDC system throughout would be more efficient.

Conclusion

35. We trust PINS will consider the above carefully and reject NG's submission. We believe that a full understanding of the sequence and content of purported consultations on what is now put forward for a DCO can only lead to the conclusion that, as matters stand, it would be unlawful for it to go forward, and it is better that is established now rather than at the end of the DCO process.
36. We write cautiously, including with the benefit of leading counsel's involvement. We can add full detail if sought, including of ESNP's various and evidenced representations to NG. We emphasise again that we are not trying to subvert the national interest, but ESNP is determined to ensure that a lawful decision is made. We trust you will agree that is best achieved by getting things right at this stage.

Yours faithfully


RICHARD BUXTON SOLICITORS

cc. ENSP attn: 

SUMMARY OF COUNTY COUNCIL POSITIONS ON NORWICH TO TILBURY

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INTRODUCTION


In a few weeks, local planning authorities will be asked to express their opinions about adequacy of consultation, when National Grid submits its DCO to the Planning Inspectorate.

The councils are aware of the legal opinion by Lord Charles Banner, KC, which makes it clear that the adequacy of consultation test in the Planning Act 2008 incorporates and includes the general legal principles of public consultation (for example, Gunning Principles). They are not separate things and it would be obviously wrong in law to think otherwise. There is no distinction between adequacy of consultation under the Planning Act and general legal consultation principles.

With this in mind, we have summarised in this paper the positions of Essex, Suffolk, and Norfolk County Councils on the Norwich to Tilbury (N2T) electricity transmission project proposed by National Grid, highlighting their consistent and robust objections across consultations from 2022 to 2025.

Common Themes Across Councils:

- **Inadequate Consultation:** They criticise National Grid for poor engagement, lack of evidence, and a predetermined route, undermining the consultation process.
- **Call for Alternatives:** They consistently advocate for offshore transmission or HVDC undergrounding, supported by independent reports (e.g., Hiorns, ESO Study) suggesting these are viable but underexplored.
- **Opposition to Overhead Pylons:** All three councils oppose the 180-184 km overhead pylon network, citing significant environmental and community impacts.
- **Need for Pause:** The councils urge a delay to reassess alternatives, questioning the 2030 timeline and suggesting a 2034-2035 need.

- 
- Cumulative Impacts: Concerns include uncoordinated energy projects and insufficient assessment of cumulative environmental and social impacts.
 - Local Benefits: The councils highlight the lack of direct benefits for their regions, as the energy primarily serves London and the South-East.

Below is a concise summary of each council's stance, and more detail is provided in the pages that follow:

Essex County Council (ECC):

- 2022 Non-Statutory Consultation: ECC criticised the project as premature, lacking evidence and early engagement, with a fixed route ignoring alternatives like undergrounding or offshore options. They argued the consultation process was flawed, failing to assess cumulative impacts or alternative options adequately, and called for a pause to reconsider the approach.
- 2023 Non-Statutory Consultation: ECC maintained its in-principle objection, noting minimal changes to the 2022 route and insufficient engagement, reinforcing the need for better consultation and exploration of alternatives.
- 2024 Statutory Consultation: ECC objected due to inadequate pre-consultation engagement, a rushed timeline for a 2030 delivery, and an incomplete Preliminary Environmental Information Report (PEIR). They requested an additional consultation round to address environmental impacts and mitigation, emphasising the lack of coordination with other energy projects.
- 2025 Targeted Consultation: ECC reiterated its objections, noting that the 13 proposed changes did not address their core concerns, maintaining that the process and evidence remain inadequate.

Suffolk County Council (SCC):

- 2022-2023 Consultations: SCC opposed the overhead pylon proposal, advocating for a pause to explore offshore or High Voltage Direct Current (HVDC) undergrounding alternatives. They criticised the lack of detailed assessment of alternatives and poor community engagement.
- 2024 Statutory Consultation: SCC formally objected, supported by reports (e.g., Hiorns Report, ESO East Anglia Study) suggesting the project could be delayed to 2035, allowing time to assess alternatives. They emphasised the need to protect landscapes like the Waveney Valley and criticised National Grid's uncoordinated approach.
- 2025 Targeted Consultation: SCC expressed disappointment over National Grid's decision to pursue overhead lines in the Waveney Valley, reiterating the need for

[REDACTED]

offshore or underground solutions and criticising the rushed 2030 decarbonisation target.

Norfolk County Council (NCC):

- 2022 Non-Statutory Consultation: NCC urged exploration of offshore or underground options, emphasising minimal onshore impact and the need for compensation for affected communities. They questioned the necessity of a new line versus upgrading existing infrastructure.
- 2023 Non-Statutory Consultation: NCC maintained its call for offshore or underground solutions, noting insufficient consideration of alternatives and environmental impacts.
- 2024 Statutory Consultation: NCC objected, citing the ESO Study and an independent review suggesting the project's need by 2035, not 2030. They supported undergrounding the entire Norfolk route, especially in the Waveney Valley, and criticised the lack of local benefits from the transmitted energy.
- 2025 Targeted Consultation: NCC expressed disappointment that proposed amendments ignored strategic concerns, continuing to support offshore or fully underground options and highlighting the lack of local energy benefits.

The councils collectively call for a coordinated, environmentally sensitive approach, prioritising offshore or underground solutions and better community engagement to minimise the project's impact on their landscapes and residents.

ESSEX COUNTY COUNCIL

First non-statutory consultation June 2022¹

“The route as given to us comes almost as fixed without the necessary evidence or engagement in pre consultation, hence this consultation itself is considered premature and misguided at this time.”

“All options moving forward should be the subject of extensive consultation.”

“Whilst it is understood that this NSIP proposal comes forward at this time, ECC remains concerned that there is no overall co-ordination between the projects, nor any assessment of their potential cumulative impacts, which is an omission that needs to be addressed.”

“...none of this optioneering process has been the result of consultation with ECC nor any other District Council in Essex or stakeholders as far as we are aware, and the reason given for the same is speed. It is acknowledged that there is a need to meet set targets, however with the proliferation of NSIPs’ being consented and proposed, it seems that this Grid project is very late to being considered and has little if any early engagement within Essex or our communities...”

“With development on and off the so called “Energy Coast”, having been proposed and promoted for many years, it is correct to ask why EAG is so late to being put forward. To ECC it looks and feels like the EAG proposal has come forward as afterthought and has been promoted in a hurry, whilst it could have been appropriately planned, programmed and considered with both statutory consultees and with the many local communities it will significantly impact. This should have happened at a much earlier stage.”

“...it is apparent that the NG is consulting on one route corridor and have either discounted or not fully assessed the other alternative options. This non statutory consultation has taken place after these decisions have been made by NG and in advance of stakeholders being able to see and evaluate the impacts of the alternatives.”

“...it is considered that as submitted the consultation does not, in any meaningful way, consider the material impacts of the currently discounted alternatives in either relative or absolute terms whatsoever.”

“Hence it is reasonable and correct to conclude at this time that NG have fixed the route and discounted alternative options, including additional undergrounding and undersea routes, upgrading existing infrastructure etc and without first evaluating and providing evidence necessary to the DCO process so the environmental and social impacts of the preferred corridor, when set against the alternative options, cannot, in any reasonable way, be

¹ <https://www.essex.gov.uk/sites/default/files/2023-07/Essex%20County%20Council%27s%20response%20-%20to%20Norwich%20to%20Tilbury%20-%2016.06.22.pdf>

considered as appropriate. ECC is of the view that the decision to fix the route within the currently consulted corridor is premature and unsupported by evidence, hence the preferred corridor route is also premature.”

“The current non-statutory consultation is therefore considered to fall unacceptably short in terms of providing evidence and information to make an informed comment on the environmental impact.”

“Although it is acknowledged that the consultation is non-statutory, it nevertheless seeks to place value in the DCO process, and without evidence being provided as to the options within it, it cannot be foreclosed. ECC consider that the process needs to be revisited, considered and examined so responses to the alternatives, including an undersea link, can be appropriately considered. The preferred route is set in this consultation as almost a “fait accompli” which in itself is not based on sound evidence and consideration.”

“It is remembered that there are other comparable NSIP proposals for Grid connection proposals, and here the current live Bramford to Twinstead project by NG is referenced. This project underwent significant pre-consultation discussions on route options over a long period of time, yet EAG has undergone none of this pre engagement whatsoever. This is considered a demonstrative and significant flaw in the process at this time with which proper planning could and should have been undertaken.”

“This consultation as submitted shows the project not at a formative stage, it is considered that there are insufficient reasons to substantiate the “preferred option” to enable constructive and informed responses for all consultees, which and as it stands significantly and demonstrably harms the consultation process for both the consultees and NG. It is acknowledged that the consultation at this time is non statutory, nevertheless its purpose is to seek to develop and shape the proposals as they come forward. Without adhering to the basic principles of consultation at the outset this means that the entire process will be ill informed, biased and skewed to its lasting detriment. Without an acknowledgment this proposal has been poorly prepared and inadequately communicated and evidenced, hence in the view of ECC this will be extremely difficult for NG to take forward without a pause and a serious rethink.”

Second non-statutory public consultation August 2023²

“ECC’s in principle objection to the strategic proposal still stands, alongside more detailed objections to sections of the draft 2023 preferred route. These grounds for objection are discussed further in the remainder of this letter.”

“For brevity, ECC have sought to provide comments in relation to the proposed changes only, or where it considers there are important outstanding matters that it would wish to resolve

² <https://www.essex.gov.uk/sites/default/files/2024-07/Norwich%20to%20Tilbury%20-%20our%20response%20to%20the%20second%20non-statutory%20consultation%20-%20August%202023.pdf>

prior to NGET's planned statutory consultation in 2024. It is recommended that this 2023 consultation response is read alongside ECC's previous June 2022 response to the 1st round of non-statutory consultation, which has been included as an appendix 1."

Statutory public consultation 25 July 2024³

"...ECC must therefore maintain its in-principle objection to N2T on the following grounds, which are discussed in more detail below:

"...ii. Object to NGET undertaking an accelerated programme of consultation to meet an uncertain 2030 programme delivery date on what ECC considers to be a predetermined strategic proposal and 2024 preferred draft alignment"

"1.7 NGET did not consult ECC or any key local stakeholder about its strategic proposal prior to pre-application and have made very few changes to the 2022 preferred draft alignment."

"1.8 In a letter to NGET dated 1 March 2024 (Appendix 9) ECC requested that NGET 'pause' its statutory consultation due to the lack of constructive engagement in the preliminary environmental impact assessment work that has been used to inform the PEIR. ECC remains of the opinion that statutory consultation is premature and are further concerned at what appears to be an accelerated and narrow programme of engagement for the 2024 preferred draft alignment that is dependent on a single statutory consultation."

"1.9 ECC does not consider that the PEIR provides sufficient baseline information to fully understand the LSE of N2T, either in isolation or cumulatively with other energy NSIPs or large-scale development. Further that NGET did not provide adequate information or timescales prior to statutory consultation for ECC or other host local authorities to consider and respond to the environmental assessment methodologies or proposed mitigation that has then been included in the PEIR. Conversely, the same concern applies to NGET that they did not give sufficient time prior to statutory consultation to constructively consider any comments that ECC were able to make about the PEIR. The inadequacy of consultation and the poor quality of the PEIR, which ECC notes does not include any detail on haul roads and associated development, is to the detriment of statutory consultation. ECC considers that to meaningfully influence the design or mitigation required to minimise the impacts and maximise the benefits from N2T for local people, business, and place that an additional round of statutory consultation is required. Otherwise, how does ECC or local people feed into the development consent process of commenting on the design, assessment, and mitigation, which should include compensation that is required with little to no information on key issues?"

³ <https://www.essex.gov.uk/sites/default/files/2024-07/Essex%20County%20Council%20response%20to%20Norwich%20to%20Tilbury%20consultation%20-%202025.07.24.pdf>

[REDACTED]

“1.10...Due to the substantive and ongoing concerns about inadequate engagement prior to statutory consultation and the large volume of assessment work still required, ECC considers that additional statutory consultation is essential to ensure robust environmental impact assessment and a high-quality development consent application. Without additional consultation, ECC could only conclude that it has not been given meaningful opportunity to influence the design or mitigation required to minimise the impacts and maximise the benefits from N2T for local people, business, and place.”

“2.6... This further adds to the concerns of ECC that the strategic option and choice of strategic proposal has been predetermined and will remain an example of the uncoordinated and inefficient approach to energy transmission...”

Targeted Consultation 2025⁴

“1.1.4 This ECC response and the comments contained within this letter, considers the 13 locations we have been consulted on. Equally it is important to restate our position with regards to the ‘in principle’ objections and that comments made in the Council’s response to the statutory consultation in July last year remain relevant unless otherwise stated.”

⁴<https://www.essex.gov.uk/sites/default/files/2025-05/Essex%20County%20Council%20response%20to%20the%202025%20Norwich%20to%20Tilbury%20consultation.pdf>

SUFFOLK COUNTY COUNCIL

Suffolk County Council statements and press releases relating to Norwich to Tilbury project, from 2022 – 2025

“Unique landscape to be changed forever by pylons” 07 Jan 2025

“As a council, we still maintain that the opportunity to underground the whole pylon run between Norwich and Tilbury, using HVDC cables, has not been properly explored. Revisiting the 2030 decarbonisation target and pausing the project would allow that to happen.”

Council objects to Norwich to Tilbury pylon proposals. 8 June 2022

Suffolk County Council has confirmed its intention to object to the proposals for National Grid’s East Anglia GREEN pylon run.

... the council does not support this proposal as it stands. It believes that there are better ways to manage the project, **for example involving an undersea network which has not been fully investigated.**

County Councils unanimously agree “no” to damaging pylons proposal.
20 Jul 2022

Authorities in Essex and Suffolk have united to condemn the current proposals for a 180km network of 50m tall electricity pylons.

Essex County Council and Suffolk County Council have passed motions at their full council meetings in July, to oppose the East Anglia GREEN proposal put forward by National Grid for a 180km network of electricity pylons between Norwich, Bramford and Tilbury. Norfolk County Council is expected to consider the motion at its next full council meeting, following a planned debate yesterday (19 July 2022) being postponed.

Councillor Kevin Bentley, leader of Essex County Council, said: We are incredibly **disappointed that this initial, non-statutory consultation explored just one option: a disruptive network of overground cables. It was presented in such a way that this is the only option**, and that it is a done deal. I would like to assure our residents in Essex, and our friends in Norfolk and Suffolk, that is certainly not a done deal, and together we will oppose the current proposal at every opportunity **and pressure for alternative solutions to be fully detailed.**

[REDACTED]

Councillor Matthew Hicks, leader of Suffolk County Council, said: **“There has been no clear and detailed information presented on alternatives, particularly an offshore solution. In Suffolk, we have been lobbying for strategic electricity networks since 2011 and we will continue stand firm alongside our neighbours to ensure that Suffolk, Norfolk, and Essex are not damaged by the serious shortcomings in these current plans.**

Councils set out concerns as public consultation opens for Norwich to Tilbury proposals. 30 Jun 2023

Essex County Council, Norfolk County Council and Suffolk County Council united in expressing concerns regarding project.... are being consulted on the proposals as statutory consultees. All three councils have already raised concerns to the initial consultation undertaken last year.

Councillor Richard Rout, Suffolk County Council’s Deputy Leader and Cabinet Member for Finance and Environment, said: “ ... **However, we and our partner councils believe this can be far better, and sustainably, achieved by viable alternative means, and without the detrimental impact** to our residents, businesses and the local environment that would be caused by the current proposals.”

Norfolk County Council feel that **alternative options to overhead power lines need to be fully investigated.**

Energy developers must stop mistreating Suffolk’s communities. 17 Jul 2023


Cllr Rout continues: “They must involve communities from the earliest stages, forge positive relationships and find ways to work together, so that if consent is granted, we see a better and fairer project for all concerned.

Pylon project does not go far enough to protect Suffolk’s best landscapes 07 Aug 2023

Suffolk County Council is not supporting National Grid’s latest plans to install 114 miles of electricity pylons.

... **“But if we are going to get behind projects like Norwich to Tilbury, our communities must be treated fairly and the impacts on them should be fully assessed. As it stands, the Council does not believe that NGET’s current proposals go far enough.**

“First and foremost, we would expect an offshore solution to be fully researched. This would mean that most of the cabling and infrastructure would be out at sea,



Councillor Rout continues: “Our communities should be afforded the respect of proper communication, be treated fairly, and benefit from the co-ordination of the significant energy projects affecting our county.

Councils unite against National Grid pylon proposals. 11 Sep 2023

Essex, Norfolk and Suffolk County Councils have come together to express their collective concerns with National Grid’s proposed “Norwich to Tilbury” pylon project.

In a [joint letter to National Grid](#), the leaders of the three councils address the extensive impact on landscapes and local communities that the scheme would bring.

They also highlight that an offshore solution has not been sufficiently investigated, and the opportunities that this could bring to co-ordinate with other large-scale energy projects off the region’s coast.

We all agree that studies into an offshore solution have not been appropriately explored, this is a viable option which we feel has been dismissed too readily.

County Councils remain united against Norwich to Tilbury onshore option, 8 Nov 2023

E Anglian Leaders urge National Grid to make the right choice, not the short-term one.

Essex, Suffolk, and Norfolk County Council leaders are urging National Grid to reconsider their preferred onshore option following findings of a recent review.

The councils jointly commissioned and have now published an independent report into the Norwich to Tilbury project, which proposes the construction of a new high voltage electricity transmission line between Norwich in Norfolk, Bramford in Suffolk and Tilbury in Essex.

Leaders of the three county councils are now asking National Grid Electricity Transmission (NGET) and the electricity system planner, National Grid Electricity System Operator (NGESO) to consider the findings.

The report, by Hiorns Smart Energy Networks, reviews the options considered by National Grid, including the preferred option of a pylon line between Norwich and Tilbury.

However, they remain concerned that the need for, and timing of, the current proposals is uncertain and not robust.

This uncertainty brings into question the need case for National Grid’s preferred option, of a land-based pylon line.

However, it challenged the delivery date of 2030, and suggested that the need for additional transmission capacity would be closer to 2035, or beyond. This supports the concerns raised by the three councils.

“I would urge the government to use this extra time not to rush ahead with building pylons years before they’re needed, but rather to thoroughly **test and cost-up the alternative options** that could, if implemented, significantly reduce the impact on our communities and precious environment.”

Waveney Valley “a valued landscape” according to new study, 19 Apr 2024

New study has highlighted the value and importance of the landscape in the Waveney Valley.

The “[Valued Landscape Assessment](#)” was jointly commissioned by Norfolk County Council and Suffolk County Council, with support from officers at both South Norfolk District Council and Mid Suffolk District Council.

Norwich to Tilbury pylons: council to object to plans and call for pause 14 May 2024

Suffolk County Council’s Cabinet will formally object to National Grid’s current proposals for pylons between Norwich and Tilbury. The total length of pylons would be 183 kilometres, consisting of around 158 kilometres of new overhead line supported by 520 pylons.

A paper to be presented by Councillor Richard Rout at the Cabinet **meeting on 21 May 2024, will recommend that the council’s position is to call for a pause to consider alternative options, such as an offshore solution, or High Voltage Direct Current (HVDC) undergrounding.**

It will also object to the current proposals for a number of reasons, including:

- the need for additional undergrounding of cables in the Waveney Valley and elsewhere along the route

Councillor Richard Rout, Suffolk County Council’s Deputy Leader and Cabinet Member for Finance and Environment, said: **“Our message to National Grid and Ofgem is that the current proposals must be put on hold so that the alternative solutions, which do not involve pylons, can be properly explored.**

... in our opinion, there are significant issues which remain - not least adequate research into offshore solutions or HVDC, as well as more clarity around the cumulative impact of other energy projects. Therefore, we have no choice but to object to the proposed scheme.”

[REDACTED]

The [ESO East Anglia Network Study](#) by The National Grid Electricity System Operator, explored better ways to connect offshore wind in Norfolk, Suffolk, and Essex. The council previously stated that it was critical for National Grid to take these findings into consideration as they continue planning their Great Grid Upgrade, including the Norwich to Tilbury project.

The “[Valued Landscape Assessment](#)” of the Waveney Valley, commissioned by Norfolk and Suffolk County Councils, acts as a timely reminder to National Grid, of the need to respond effectively and robustly to the sensitivities of Suffolk’s landscapes and communities.

The [Hiorns Smart Energy Networks report](#), also commissioned by Norfolk and Suffolk County Councils, suggested that it is possible for the Norwich to Tilbury project to be paused in order to consider alternatives.

Council remains opposed to Norwich to Tilbury pylons in formal consultation response, 26 Jul 2024

Suffolk County Council has formally objected to National Grid’s current proposals for pylons between Norwich and Tilbury, as it submits its response to the project’s statutory consultation.

Various reports support the council’s position of objecting to the scheme and the council has reiterated the scope for the project to be delayed. This, in turn, opens up **the opportunity for a full assessment of other viable alternatives, such as an offshore solution or the undergrounding of cables.**

Councillor Richard Rout, Suffolk County Council’s Deputy Cabinet Member for Nationally Significant Infrastructure Projects, said: **“Pylon-free solutions remain possible, and National Grid and Ofgem need to take these seriously and fully assess the options.**

Cllr Rout continues: **“The Hiorns report which we commissioned with Norfolk County Council, summarises that ‘there is the opportunity to pause development of the Norwich to Tilbury project’.**

“This is something which must be recognised, so that the best possible solution can be fully explored to help provide energy security to the country, whilst being fair to, and supportive of, the many communities that will be affected.

Suffolk and East of England councils seek fairness in the face of energy projects, 16 Dec 2024

The county councils from Suffolk, Essex, Norfolk and Lincolnshire all face similar challenges with Nationally Significant Infrastructure Projects (NSIPs) being planned for their counties.

Two of Suffolk County Council’s main concerns, shared with the other counties, are:

- The uncoordinated approach to NSIPs - this is creating significant challenges for Suffolk's rural communities under the current planning policy as applied by the planning inspectorate and Secretary of State
- The government's 2030 target for decarbonising the electricity grid – this is too hasty, making it impossible to deliver alternative solutions to pylon projects like Norwich to Tilbury

“Unbelievably, many energy projects are simply not being coordinated, even those proposed by the same umbrella organisation.

There are other viable alternatives (to pylons), such as offshore or underground cabling. These options have still not been properly costed, despite what the government or National Grid may say, and are likely to prove more beneficial and efficient if given suitable consideration and time.”

Unique landscape to be changed forever by pylons, 07 Jan 2025

In a letter to both Norfolk County Council and Suffolk County Council, and other local leaders, National Grid has outlined that it has decided to install overhead lines through the Waveney Valley, rather than running cables underground, as they had set out in their previous consultation.

Councillor Richard Rout, Suffolk County Council's Deputy Cabinet Member for Nationally Significant Infrastructure Projects, said: “This decision not to underground any of the proposed pylons through the Waveney Valley, is nothing short of contemptible. The study we commissioned saw the area recognised as a valued landscape and National Grid's plans will wreak untold damage on it. There was a clear alternative to this and they've chosen not to take it.

“Yet again, I see this as more evidence of the government's short-sighted and rushed mission to decarbonise the grid by 2030. Their influence is pushing through the cheapest and fastest options, with no consideration for local residents, businesses or the environment

Formal Responses from Suffolk County Council to Consultations (Selections)

Norwich to Tilbury Statutory Consultation 10April – 26 July 2024 Comments of Suffolk County Council

From Introduction, page 4

Cabinet Resolution

1.6 At its Cabinet meeting of the 21 May, SCC resolved to:

....

b) Set out the Council's **clear preference for alternative options, as published by the Electricity System Operator, in particular, for High Voltage Direct Current Undergrounding, or, if practicable and deliverable, an offshore solution**, being mindful of potential impacts in East Suffolk;

c) To formally and strongly request National Grid (NGET), (and Ofgem recognising the applicant's licence obligations) **to pause the Norwich to Tilbury proposals, to enable the effective consideration of these alternatives;**

d) To lodge an objection to the scheme, as currently presented, because;

i) Of the need for additional undergrounding, of both the proposed 400Kv Line and of UK Power Networks Infrastructure;

ii) The proposals do not adequately address significant issues, and that the Council expects, in the highlighted areas, clearer assessments, outcomes, and mitigations, to be included in the application that will be submitted to the Planning Inspectorate;

Alternatives p 5+

2.5 The County Council's **believes credible alternatives such as an offshore centred approach or High Voltage Direct Current undergrounding, delivered at pace, to minimise onshore infrastructure in Suffolk should be explored fully. If this approach can deliver an alternative to Norwich to Tilbury in a timely manner, without risking wider Net Zero, renewable generation, and decarbonisation targets, it would be welcomed by the Council and the communities it represents.**

2.6 On **behalf of all local authorities along the Norwich to Tilbury route, Essex County Council commissioned consultant Andy Hiorns⁵** to produce a Report into the need for the Norwich to Tilbury proposals. The report concluded that the **proposals were premature and would not be needed until the mid-2030's**. This is disputed by NGET⁶. However, the Report also concluded that alternative offshore alternatives would be much more expensive.

Norwich to Tilbury Statutory Consultation, Suffolk County Council, Page 6

2.7 The National Grid Electricity Systems Operator (NGESO) have also published a report into the various alternatives to grid reinforcement in their East Anglia Study. This included ten different network options including a primarily offshore option. It also concluded that alternative offshore alternatives or a HVDC Norwich to Tilbury underground link would be more expensive and procurement of the cables would delay implementation.⁵ NGET concurs with these conclusions.

2.8 Considering the above the County Council **calls for a pause of the proposals to**

⁵ <https://www.suffolk.gov.uk/asset-library/n2t-the-hiorns-report.pdf>

⁶ <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/norwich-to-tilbury>

[REDACTED]

enable the full assessment of the potential alternative coordinated offshore solutions or alternatively onshore high voltage direct current undergrounding, as prepared the Electricity System Operator (ESO) to be made.

NORWICH TO TILBURY – TARGETED CONSULTATION March 2025, Page 3 of 24

1 Introduction

1.1. Suffolk County Council (SCC) understands that the targeted consultation (30 January to 3 March 2025) includes six locations in Suffolk where National Grid, the promoter, is proposing changes from those in the statutory consultation which took place from 10 April to 26 July 2024.

1.2. The County Council considers that credible alternatives such as an offshore centred approach or High Voltage Direct Current undergrounding, delivered at pace, to minimise onshore infrastructure in Suffolk should be explored fully. If this approach can deliver an alternative to Norwich to Tilbury in a timely manner, without risking wider Net Zero, renewable generation, and decarbonisation targets, it would be welcomed by the Council and the communities it represents.

1.3. SCC also notes that this targeted consultation does not includes reference to the proposals for the Waveney Valley Alternative, as consulted on during the statutory consultation and that a decision was made prior to this targeted consultation not to take forward this alternative proposal. Instead, SCC understands that National Grid has taken the decision to pursue overhead line in this sensitive landscape. SCC regrets this outcome and will comment on the Waveney Valley Alternative decision in this targeted consultation response document.

NORFOLK COUNTY COUNCIL

News articles

South Norfolk Council calls for pause on National Grid's Norwich to Tilbury Project, 6 August 2024

South Norfolk Council has called for a temporary halt to National Grid's proposed Norwich to Tilbury electricity transmission project. The council believes that a pause is essential to allow for a full and thorough evaluation of all alternative options...

The council has previously raised concerns about the project during non-statutory consultations in 2022 and 2023. These concerns remain valid and are further emphasised in the council's latest response...

South Norfolk Council is calling for a coordinated offshore approach to minimise onshore infrastructure. If this is not possible, the council supports putting the entire route underground.

The council believes that the recent study by the Electricity Systems Operator (ESO) into alternative transmission options has not been properly considered by National Grid. Additionally, the findings of the Independent Review commissioned by Norfolk, Suffolk, and Essex County Councils, which suggested that the project may not be needed until 2035, have also been ignored...

Norfolk opposes 184km pylon scheme

Councillors in Norfolk have objected to a National Grid proposal to construct an electricity transmission line across three counties, 14 June 2024 [From LocalGov.co.uk](#)

In non-statutory consultations, the three affected county councils have urged National Grid to reconsider the scheme.

This week, Norfolk County Council's planning and highways delegations committee agreed to object to the proposal, arguing that alternative options, including an offshore or underground scheme, had not been adequately considered.

The council has said it recognises the need to add capacity to the network but not until 2035, while National Grid plans for a 2030 delivery date.

Norfolk will now ask the utility firm to pause its plans and consider the alternative options with the Electricity Systems Operator, Department for Energy Security and Net Zero, and local stakeholders

"Norfolk County Council's planning and highways delegations committee agreed to object to the proposal, arguing that alternative options, including an offshore or underground scheme, had not been adequately considered" [LocalGov.co.uk 14 June 2024]

Norfolk County Council Response to National Grid's Non-Statutory Consultation on: East Anglia Green Project June 2022

2. General – Overview

2.1 **Alternative Options** - ... the County Council **would strongly urge** National Grid and the Department of Business, Energy and Industrial Strategy (BEIS), along with the OFGEM to **consider**:

- **An offshore option** – involving some form of offshore transmission network capable of delivering power direct from source to where it is most needed ... London, and the South-East;
- **Under-grounding option** – in the event that the offshore solution is not feasible in the current timescales; every effort must be made to bury the proposed cables underground to avoid the damaging impacts on local communities in Norfolk.

2.2 In addition to the above National Grid will **have to clearly demonstrate through their supporting evidence accompanying any DCO application that full consideration has been undertaken in relation to any network reinforcement options**, which could comprise improvements or extensions to existing infrastructure rather than an entirely new line – in-line with National Policy Statement (NPS) for Electricity Networks Infrastructure (EN-5) published by the Department of Energy and Climate Change (2011).

2.5 Compensation – National Grid will **need to consider appropriate compensation packages for those homes and businesses** directly affected by both the construction works, and any long term impacts. The route of any power-lines will need to avoid any direct impacts on business.

Planning and Highways Delegations Committee 8 Sep 2023

3. Impact of the Project on Norfolk and Comments

(a) Strategic Comments – Overarching Comments

3.3 Given that proposed alignment follows the previous corridor, it is **recommended that the County Council's original over-arching comments (June 2022) should be maintained**, urging National Grid and the Department for Energy Security and Net Zero (DESNZ) to consider:

- **Further investigation into the offshore option** – involving an offshore transmission network capable of delivering power direct from source to where it is most needed;
- **Under-grounding option** – in the event that the offshore solution is not deliverable / feasible within the timescales required; every effort must be made to bury the proposed

[REDACTED]

cables underground to avoid landscape impacts; and impacts on local communities in Norfolk; and

- **Upgrading where possible the existing over-head power lines to increase capacity.** It is understood, however, that National Grid have already started upgrading the existing overhead line.

Planning and Highways Delegations Committee

Minutes of the Meeting Held on Monday 10 June 2024 at which the Committee resolved to raise an objection to the pylons on the basis of preferable alternatives.

7. Norwich to Tilbury Overhead Power Line Proposal – Statutory Consultation by National Grid
10 April-26 July 2024

7.2 The Principal Planner introduced the report, which was produced in response to the recently published statutory consultation from National Grid relating to the proposed Norwich to Tilbury electricity transmission project.

7.3 The following key points were highlighted to the Committee:

- National Grid previously consulted Norfolk County Council on two separate occasions in 2022 and 2023, under a non-statutory consultation. The Planning and Highways Delegations Committee **considered the non-statutory consultation at its September 2023 meeting, where the Committee made clear that it wanted to see an offshore option if feasible to implement. If this was not deliverable, a total undergrounding of the project between Norwich and Tilbury was favoured.**

- There had been a **number of changes since the non-statutory consultation. This included provision for part undergrounding of the transmission line through the Waveney Valley and underneath the River Waveney. A series of minor alignment changes were also proposed to the route in Norfolk, to avoid planned battery storage facilities, solar farms, and sites of archaeological interest.**

- During the **summer of 2023, Norfolk County Council commissioned an independent report into the project alongside Essex County Council and Suffolk County Council, which conducted a review on the need to augment the transmission network in the East of England. The report concluded** there was a demonstrable need to upgrade the transmission network, due to offshore wind farms coming on-stream and the approval of Sizewell C nuclear power station, along with other future power projects in the Region. The report cast doubt on the timescale for when the project was needed, suggesting that the extra capacity was required by 2035, as opposed to the 2030 deadline quoted by National Grid. The additional five years would provide enough time to review the project and consider alternatives. *[Pylons East Anglia note: Hiorns Report stated capacity not required until 2034]*

- A second report, produced by the Electricity Systems Operator (ESO), was published in March 2024, four weeks before the commencement of the statutory consultation. The report considered ten alternative solutions for the transmission network, of which there were four

[REDACTED]

basic categories. These were predominantly offshore, onshore overhead lines, **onshore underground cables**, and a hybrid onshore/offshore option. The conclusion from the ESO report stated the most economical option was overhead power lines; **however, this did not take environmental concerns into account.**

- The Waveney Valley undergrounding proposal would comprise only 2km of the 30km route within Norfolk. Officers and Local Members had stressed that **much more of the transmission network needed to be underground, as it was felt that the cumulative effect of the existing 400kV pylon network in South Norfolk, along with the existing local UK Power Networks (UKPN) 132 kV network had not been sufficiently considered by National Grid.**

7.4 The following points were discussed and noted:

- The Chair commented that he had raised concerns with National Grid that Norfolk would not benefit from the power being transmitted through the county to support planned housing and local economic growth. However, National Grid responded that they were only responsible for transmission, directing the Council to speak with UKPN to see if there was a way for Norfolk to tap into the network. Conversations were currently ongoing.
- A Committee Member stated that the project would see the village of Roydon virtually encircled with pylons, with the Local Member for Diss and Roydon expressing **grave concern during the Scrutiny Committee meeting in May. Undergrounding was considered a more prudent option for Norfolk, with the Committee Member illustrating the example of a cable route within his division which was installed underground with no detrimental impact visible. There did not appear to be an assessment as to why the offshore option was not being taken up by National Grid**
- A Committee Member agreed with the comments from the Scrutiny Committee, stressing that the omission of Norfolk from being a beneficiary of the transmission network needed to be resolved by National Grid directly, rather than passing the Council onto UKPN. **The independent report from the three local authorities was clear that while overhead lines were the cheapest solution, this did not take into account the effects on residents and the environment.**
- The Vice-Chair expressed concern regarding the impact of the project on the environment and the residents of Norfolk. **It was imperative that alternative solutions were considered in full.**
- The Chair stated that Recommendation 5 in the report presently read “to WELCOME National Grid’s proposal to underground part of the route to the west of Diss (Waveney Valley Alternative) **but would like to see this underground area expanded significantly**”. The Chair proposed an amendment to the recommendation, to replace “significantly” with the phrase “to the full length of Norfolk.” This amendment was unanimously CARRIED by Committee Members.

7.5 The Planning and Highways Delegations Committee RESOLVED the following:

-
1. To RAISE an objection to the current proposal in light of the recent ESO Study (March 2024) and the **alternative transmission options** outlined in that study.
 2. To ASK National Grid to **pause their current proposal and consider the alternative** options with the ESO, Department for Energy Security and Net Zero, and local stakeholders;
 3. To **SUPPORT in principle either an offshore option or, if this was proved undeliverable, an undergrounded onshore option.**
 4. To AGREE that on the event of an onshore option being taken forward, National Grid should commit to delivering wider benefits and opportunities to provide power to meet the needs of existing and planned growth in Norfolk and contribute towards funding an Energy Plan for the County.
 5. To **WELCOME National Grid's proposal to underground part of the route to the west of Diss (Waveney Valley Alternative) but would like to see this underground area expanded to the full length of Norfolk.**
 6. To ENDORSE the comments set out in this report

26 July 2024 – Response emailed to Mr Simon Pepper with letter:

Planning Act 2008: Norwich to Tilbury Project

South Norfolk Council's Response to the Statutory Consultation, under Section 42 of the Planning Act, between 10 April and 26 July 2024 undertaken by National Grid Electricity Transmission (NGET) for the proposed Norwich to Tilbury (NT) Nationally Significant Infrastructure Project (NSIP)

The Council has previously responded to National Grid on two non-statutory consultations in June 2022 and August 2023, the **concerns raised in our previous comments still stand** and this response adds to those comments...

... our understanding of the need to change **doesn't mean that we should accept the single option presented to us. Whilst the energy will pass through our district to other areas, we are impacted by proposals for which we receive little local benefit. The significant harmful and potentially devastating impact on our district from the proposed project as presented in this Statutory consultation is of substantial concern...**

... **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**

[REDACTED]

The Council has concerns that the findings of the recent Study (March 2024) undertaken by the Electricity Systems Operator (ESO) relating to **a series of alternative transmission options across East Anglia has not been adequately considered by National Grid**. Following the Independent Review commissioned by Norfolk, Suffolk and Essex County Council's which suggested that **the delivery is not needed until 2035, we also have concerns regarding the timing of the proposal**. In view of the above it is considered that **National Grid have not adequately addressed the alternative transmission options set out in the ESO Study nor findings of the Independent Report commissioned by Norfolk County Council together with Suffolk and Essex County Council's**.

As the Council has set out in its previous consultation responses, we still consider that a **coordinated, Offshore approach** would be our preferred solution, to minimise onshore infrastructure. If this is proven to be undeliverable then the Council considers that support should be given to the **Undergrounding** the whole route.

The Council considers in view of the above that a **pause** to the scheme is necessary to enable potential alternative options to be fully considered and consulted upon.

Norfolk County Council's Technical Response to the Targeted Consultation by National Grid on their Proposed Amendments to the Norwich to Tilbury Overhead Power Line Project. Feb 2025

2. Response to Targeted Consultation

(a) Over-arching Strategic Comments

2.1 The County Council is **disappointed that the proposed amendments set out in the targeted consultation do not address any of the previous Strategic issues nor detailed technical comments raised by the County Council in its response** to the Preliminary Environmental Information Report (PEIR) statutory consultation in June 2024.

2.2 **In particular previous comments relating to alternative transmission alternatives have not been addressed in the current consultation and as such the County Council continues its objection to the current proposal for an overhead power line (400kV) between Norwich and Tilbury. The County Council continues to support in principle either: an offshore option; or if this is proved undeliverable then an onshore option which is undergrounded.**

2.3 As currently set out, the Project would see energy passing through the County with none of the energy being used in Norfolk.