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By email:  
NorwichToTilbury@planninginspectorate.gov.uk

**Our ref: PEA3/2**

**Your ref: EN020027**

**24 September 2025**

Dear Sirs

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

Further to our letter of 15.9.25, it may assist PINS also to draw attention to specific detailed statutory consultation responses by ESNP to National Grid which all inter alia go to failure in the consultation process. There is an overarching consultation response and others dealing respectively with alternatives and deficiencies considered against Gunnings principles.

We trust NG has in fact already sent them to PINS as part of its submission but just in case not we are sending copies now. Our client also has representations sent to National Grid during the earlier non-statutory consultations which also address consultation deficiencies. We do not wish to overwhelm you with materials many of which you may well/should have already from National Grid but we do want to make clear that they exist and can be provided, all going to the same point that the submission before you has a serious legal problem.

Yours faithfully

**RICHARD BUXTON SOLICITORS**

cc. ENSP attn: [REDACTED]

# Inadequate consideration of alternatives

## 1. Summary

- 1.1. **There are numerous alternatives to the Norwich to Tilbury pylons**, several of which are better for the environment, communities & businesses and have a lower cost overall. None of these alternatives have ever been presented for consultation by NGET, despite repeated requests since the first consultation in 2022. Alternatives which require appraisal, following Treasury Green Book guidance, are:
  - **Upgrading of the existing grid** using Grid-Enhancing Technologies (GETs) such as dynamic line ratings, advanced power flow controls, advanced conductors (specifically TS Conductor), transmission switching and conversion from Alternating Current overhead lines (AC OHL) to direct current (DC) OHL;
  - **Use of existing infrastructure at Bradwell-on-Sea** for a landing point for wind farms & interconnectors otherwise offered connections into N2T;
  - **Integration offshore**, including platforms for technology;
  - **HVDC undergrounding from Norwich to Tilbury**.
- 1.2. This submission evaluates NGET's approach to decision-making and consideration of alternatives. It concludes that NGET's approach is flawed.
- 1.3. As set out variously in our submissions and legal opinions in previous years, and again here, it is clear that National Grid Electricity Transmission (NGET) had already decided to use overhead lines for the Norwich to Tilbury (N2T) project, long before the first consultation in 2022. All subsequent backchecking has been nothing more than an exercise in post-justification.
- 1.4. Backchecking prior to the current Statutory Consultation was in fact so perfunctory that it excluded the long-awaited National Grid Electricity Systems Operator (ESO) East Anglia Study, published in March 2024<sup>1</sup>. Instead, this highly-material and directly relevant study was not even included in the Backcheck but was reviewed as an afterthought, in a separate document<sup>2</sup> that many stakeholders are unaware of.
- 1.5. Policy compliant alternatives have been ignored by NGET. When discounted alternatives have been presented (but not consulted on), there is insufficient information to give intelligent consideration of how they compare with NGET's long preferred option.
- 1.6. Mandatory Treasury Green Book guidance has not been followed by NGET, and claims that Ofgem requires the cheapest solution are untrue.
- 1.7. Finally, we look at the costs of each option, and in particular we highlight that the costs presented for pylons are not transparent and do not include very key and expensive elements.
- 1.8. We look below at the following:
  - Policy & legislation
  - Background
  - Backchecking
  - Treasury Green Book
  - Alternatives & costings

<sup>11</sup> <https://www.nationalgrideso.com/document/304496/download>

<sup>222</sup> <https://www.nationalgrid.com/electricity-transmission/document/154786/download>

## 2. Policy & legislation

- 2.1. **Gunning Principles** require public consultation whilst a proposal is still at a formative stage & for conscientious consideration of consultation responses. This project fails on both counts as set out elsewhere in our submissions in some detail.
- 2.2. **National Policy Statements**
  - 2.2.1. Both EN1 and EN5 make it clear that there are situations when alternatives to those proposed will be considered by a Secretary of State and that there are cases when, even outside a designated landscape, sub-sea cables or underground cables may be the best solution:
  - 2.2.2. **EN-1** allows that important and relevant alternatives can be considered by a Secretary of State (4.3.25); that a hypothetical alternative proposal should be in accordance with the NPS's (4.3.26); that proposals can proceed (4.3.27) and are not vague or immature (4.3.28). In addition, it is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are particularly relevant) (4.3.29)
- 2.3. EN-1 also provides tools which can be used to ensure an optimal transmission solution is arrived at. Those include: Natural Capital Committees' How to do it' Natural Capital Work Book and ENCA (4.6.16) and guidelines around design and design review (4.7.8)
- 2.4. Finally, EN-1 includes a requirement for "good design", with stages: evaluating policy options; evaluating project options; advice to decision-makers.
- 2.5. **EN-5** says, *"...cases will arise where – though no part of the proposed development crosses a designated landscape – a high potential for widespread adverse landscape and/or visual impacts along certain sections of its route may result in recommendations to use undergrounding for relevant segments of the line or alternatively consideration of using a route including subsea cabling."* (2.9.23)
- 2.6. And, *"In these cases, and taking account of the fact that the government has not laid down any further rule on the circumstances requiring use of underground or subsea cables, the Secretary of State must weigh the feasibility, cost, and any harm of the undergrounding or subsea option against:*
  - 2.6.1. *the adverse implications of the overhead line proposal;*
  - 2.6.2. *the cost and feasibility of re-routing overhead lines or mitigation proposals for the relevant line section; and*
  - 2.6.3. *the cost and feasibility of the reconfiguration, rationalisation, and/or use of underground or subsea cabling of proximate existing or proposed electricity networks infrastructure.* (2.9.24)
  - 2.6.4. And, *"In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if it is satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, and that any technical obstacles associated with it are surmountable. In this context it should consider:*
    - 2.6.4.1. *the landscape and visual baseline characteristics of the setting of the proposed route, in particular, the impact on high sensitivity visual receptors (as defined in the current edition of the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment), residential areas, designated*

*landscapes, designated heritage assets and Heritage Coasts (including, where relevant, impacts on the setting of designated features and areas);*

2.6.5. In addition, the Secretary of State must weigh up the cost & disruptive effects of alternatives. (2.9.25)

2.6.6. Paragraph 2.9.5 notes, *“The ES should set out details of this consideration, including the applicant’s rationale for eschewing feasible alternatives to the overhead line, and the mitigation cost-calculation methodology that this rationale may rely upon.”* This has not been done.

## **2.7. Electricity Act 1989**

2.7.1. NGET must have regard to the Electricity Act 1989. NGET has failed to 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.”

## **2.8. Treasury Green Book**

2.8.1. NGET has failed its duty to adhere to mandatory Treasury Green Book guidance for the appraisal of projects and policies, together with guidance for the appraisal of alternatives. We address this in more detail below, and NGET had the opportunity to use Green Book guidance during the project appraisal phases highlighted in EN-1.

## **2.9. Heritage**

2.9.1. NGET has failed in its need to avoid heritage harm. Two judgements point to the need to avoid risk of legal error under the Planning (Listed Building and Conservation Areas) Act 1990.

2.9.2. *High Court’s judgement in Forge Field v Sevenoaks District Council (2014)*. The Court found that a rigorous assessment of alternatives is required to minimize heritage harm and to ensure that the statutory presumption in favour of preservation is met.

2.9.3. Specifically, “If there is a need for development of the kind proposed, which in this case there was, but the development would cause harm to heritage assets, which in this case it would, the possibility of the development being undertaken on an alternative site on which on which the harm can be avoided altogether, will add force to the statutory presumption in favour of preservation.”

2.9.4. *Court of Appeal’s judgement in Bramshill vs Secretary of State for Housing, Communities and Local Government (2021)* emphasises that heritage impacts must be treated differently to other factors in the planning balance. This includes considering possible alternatives. These alternatives must be rigorously assessed, otherwise there is a risk of legal error under the Planning (Listed Building and Conservation Areas) Act 1990.

## **2.10. Environmental Statement**

2.10.1. NGET’s Environmental Statement (ES) will require consideration of reasonable alternatives.

## **2.11. Ofgem**

- 2.11.1. NGET is regulated by Ofgem. NGET likes to repeat to stakeholders that it must “deliver the cheapest solution.” However, Ofgem confirmed at a conference in March<sup>3</sup> that cost is not the be-all and end-all. Ofgem's Peter Bingham, Director of System Planning said:
- 2.11.2. Project cost is NOT the only consideration. The least cost solution is not necessarily the right solution. Balance is needed and it might be that a more attractive option is more expensive. Must consider all factors.
- 2.11.3. Ofgem must ensure genuine need and optimal solutions & look at environmental impact and long-term operability.

### 3. Background

- 3.1. The cross-boundary need case was established in the Network Options Assessment (NOA), Future Energy Scenarios (FES), Electricity Ten Year Statement (ETYS) data for network boundary capacities.
- 3.2. A cost-benefit analysis of options was conducted by National Grid ESO (ESO) using the BID 3 process and Least Worst Regret (LWR) assessment method. Please note - we remain critical of LWR further to our paper on the methodology in 2022.
- 3.3. N2T (known sometimes as East 7 and also as AENC/ATNC) was given ‘proceed’ status in the NOA 21/22 and confirmed as essential to the Holistic Network Design (HND) in the NOA refresh in July 2022.
- 3.4. (Note, however, that the East of England had been scoped out of the HND and as such better alternatives such as offshore coordination were not modelled. This is why in December 2023 ESO commenced its ESO East Anglia Network Study<sup>4</sup>)
- 3.5. This means that a decision had been taken outside the planning system<sup>5</sup>. Moreover, the NOA, FES, ETYS, HND are not relevant to the planning system. It is the Electricity Act 1989, Planning Act 2008 and associated NPS's which are of relevance in the Development Consent Order process.
- 3.6. We remind you of the following paragraph from our submission last year, which compared the Stonehenge decision<sup>6</sup> with the N2T process:
  - 3.6.1. *“...Stonehenge decision which held that the Examining Authority and the Secretary of State had failed to assess the relative merits of the scheme and its alternatives, particularly the heritage implications. The NPS for National Networks suggested that a reconsideration of the alternative options was not necessary if a route had already been appraised for RIS (Road Investment Strategy) purposes (which the DCO project route had). However, **because the RIS was not a planning document it had did not assess the wider heritage implications of the alternative options and as a result, and particularly because third parties had raised these issues and the Examining Authority had addressed them in its Report, the Judge held that the Secretary of State was irrational not to have properly assessed the alternative options, which were an 'obviously material consideration'.**”*

<sup>3</sup> The Linear Infrastructure Planning Panel

<sup>4</sup> <https://www.nationalgrideso.com/document/304496/download>

<sup>5</sup> (It is questionable whether these were lawful processes for decision-making in the first place, given the lack of public consultation in affected areas)

<sup>6</sup> <https://www.bclplaw.com/en-US/events-insights-news/dco-judicial-reviews-lessons-learned-from-recent-judgments.html>

- 3.7. In the same way, the previous “pre-planning documents” are not planning documents. They also failed to assess the heritage (or community or environmental) impacts. Consequently, they are **not relevant** to the N2T development consent order (DCO).

## 4. Backchecking

- 4.1. There has been a persistent, ongoing failure by NGET to present alternatives to its preferred N2T proposal for consultation.
- 4.2. Instead, a backchecking process has been followed which seems to ensure a perpetual post-justification of the original decision.
- 4.3. Since 2023’s consultation, two key studies have been published but are not referred to in NGET’s ‘backcheck’<sup>7</sup> document that accompanies the current Statutory Consultation.
- 4.4. The first is the NG ESO OCSS Eastern review<sup>8</sup> (March 2024). It outlines eight scenarios, and helpfully looks directly at Norwich to Tilbury, meaning that projects can be directly compared. One of the eight options, using underground HVDC cabling, is extremely favourable when compared with the N2T pylons.
- 4.5. Secondly, The Hiorns Report, commissioned jointly by Essex, Suffolk and Norfolk County Councils and published in November 2023 last autumn, stated that -
- 4.6. It is too early to conclude that Norwich to Tilbury represents the best solution.
- 4.7. NG’s workings and assumptions are not transparent. Limited sensitivities have been tested. It does not appear that most up to date methodology has been used.
- 4.8. It is likely that the need justification for the project has been overstated. The earliest need for reinforcement of the grid in Essex, Suffolk and Norfolk is 2035, not 2030. (Note anyway that National Grid’s project webpage shows a completion date of 2031, which has a very high chance of slipping, given that only 8% of large projects complete on time).
- 4.9. Landing points for interconnectors could be moved further south to Bradwell or Tilbury. This would avoid the need for additional onshore infrastructure.
- 4.10. The ESO review, published in March 2024, sets out material alternatives to the pylons which NG ET said it would take into account but has failed to. The Hiorns report makes material points about the purported need to deliver the proposal by 2030.
- 4.11. How can NGET’s preferred option be shown to be the right or best option, if newer alternatives have not been considered and independent evidence ignored?

## 5. Treasury Green Book

- 5.1. We set out once again why National Grid Electricity Transmission (NGET) should adhere to Treasury Green Book guidance when appraising alternatives.
- 5.2. We remind you that Lord Charles Banner KC wrote a legal opinion on the matter. Lord Banner concluded that in the context of the future examination and determination of an application for a DCO for the Project, Green Book guidance is mandatory, that in the context of the statutory test under s.104(7) of the 2008 Act, the Green Book is a material consideration to which regard must be had; and that a failure by the Examining Authority, and thereafter the Secretary of State, to have regard to the Green Book in either of these contexts would amount to an error of law.

<sup>7</sup> <https://www.nationalgrid.com/electricity-transmission/document/154546/download>

<sup>8</sup> <https://www.nationalgrideso.com/document/304496/download>

5.3. We respond here to NGET's assertion that the Green Book does not apply to its Nationally Significant Infrastructure Project, the Norwich to Tilbury proposal. This is what NGET says about the Green Book:

*5.3.1. "National Grid is confident that the process we follow to identify and then assess potential strategic options is robust and the most appropriate. This has been tried and tested through numerous previous projects, the formal examination process and ultimately decided by the relevant Secretary of State.*

*5.3.2. The Treasury Green Book provides guidance on the interpretation by public servants of public spending, assets and resources for projects, policies and spend from the public purse. That is not relevant for National Grid Electricity Transmission (NGET).*

*5.3.3. There is no requirement in the Planning Act 2008 for developers to have to submit a Treasury Green Book assessment as part of a Development Consent Order (DCO) application. NGET is an Office of Gas and Electricity Markets (Ofgem) regulated business, with obligations to consider customer, environmental and other considerations as outlined in the Electricity Act and in its license commitments.*

*5.3.4. Consideration of the costs of a project and the funding it should receive via the regulatory settlement is the subject of a separate regulatory process, and it is not appropriate for the Planning Inspectorate, Examining Authority, or the Secretary of State in their remit under the Planning Act to seek to duplicate other regimes. 4.2.115<sup>9</sup>*

5.4. As NGET states, "NGET is an Office of Gas and Electricity Markets (Ofgem) regulated business, with obligations to consider customer, environmental and other considerations as outlined in the Electricity Act and in its license commitments."

5.5. Ofgem acts as a steward of public resources, ensuring that the energy infrastructure serves the public interest efficiently and sustainably. This involves a balance of promoting private investment in energy infrastructure while protecting consumers and ensuring the provision of vital public services.

5.6. As well as being a regulated business, NGET is also a Statutory Undertaker (see Appendix). As such, NGET should adhere to the Treasury Green Book guidance.

5.7. The transmission network is considered to be critical national infrastructure, playing a vital role in the delivery of essential services to the public. This classification subjects the network to specific regulatory oversight and control to ensure reliability, safety, and accessibility, aligning with public interest despite being privately owned. The operation and maintenance of this infrastructure are regulated by Ofgem, which ensures that NGET meets certain standards and provides services effectively while protecting consumer interests.

5.8. The Green Book provides a framework for the appraisal and evaluation of public sector projects, policies, and programs. Nationally Significant Infrastructure Projects (NSIPs), such as N2T, fall into the projects category. The mere fact that NSIPs must be approved by a Secretary of State indicates that they are of national interest.

5.9. The Green Book aims to ensure that these initiatives are economically justified and achieve value for money. For statutory undertakers, following the Green Book guidance is important because their projects often involve both significant investment and impact on the community and environment. Adherence to these guidelines helps ensure that their decisions on infrastructure development and service provision are transparent, accountable,

<sup>9</sup> <https://www.nationalgrid.com/electricity-transmission/document/154261/download>

and aligned with broader public policy objectives. This is especially relevant when these projects receive funding or financial support from the government, or when they involve regulatory approval processes where economic justification needs to be demonstrated.

- 5.10. Therefore, the combination of being a Statutory Undertaker delivering Nationally Significant Infrastructure Projects and the status as a regulated business with obligations to consider customer, environmental and other considerations mean that not only should NGET adhere to Green Book guidance, but also that Ofgem should enforce this adherence.
- 5.11. See also para 7.2.7 below, which notes that the Green Book is relevant in the planning context, as it was applied by a Planning Inspector as part of a rejection of a local plan.

## 6. Alternatives to pylons & costings

- 6.1. We have never been consulted on alternatives.
- 6.2. **Our preferred alternative remains an integrated offshore grid** as set out in previous submission to NGET in 2022 and 2023. We do not repeat the arguments here. We remind you that three independent studies since 2011 have shown that an integrated offshore grid performs better on environmental, community and cost grounds. In the current absence of HVDC circuit breakers, we should be planning for their availability in the mid 30's. We remind you of the Hiorns report<sup>10</sup> which concluded that, *"It is likely that the need justification for the project has been overstated. The earliest need for reinforcement of the grid in Essex, Suffolk and Norfolk is 2035, not 2030."*
- 6.3. Two alternatives to Norwich to Tilbury are set out in NG ESO East Anglia 2024 study<sup>11</sup>:
- 6.3.1. **In the absence of an offshore grid, we would support HVDC underground cabling all the way from Norwich to Tilbury.** (2 x 2GW circuits). HVDC undergrounding is far superior to AC undergrounding, requiring a trench about a third of the width. Our supporters, including farmers, prefer it to pylons and AC undergrounding. It scored very favourably in the NG ESO study:
- 6.3.2. This is the comparison with overhead lines

Option description	Delivery date	Deliverability and operability ranking	Environmental ranking	Community ranking	Economic rating (on-time delivery)	Economic rating (2034 Delivery)
Onshore option (Pylons)	2030	Red	Amber	Red	£0 bn	£1.6 bn
Onshore HVDC Option	2034	Red	Amber	Amber	£1.0 bn	£1.0 bn

- 6.3.3. **HVDC underground then sub-sea Norwich to Tilbury merits full investigation, including interrogation of costings.** Again 2 x 2GW circuits. Note that this option has been on the table for some time, first sent to Offset MPs October 2022 by NG ET. However, costs have not been clear and there has never been a consultation or any detailed information about this option.

- 6.3.4. In addition, NGET Has neglected to properly consider **Bradwell on Sea** where there is a line of disused 132kv pylons and a disused substation – right on the coast. This should

<sup>10</sup> [n2t-the-hiorns-report.pdf \(suffolk.gov.uk\)](https://www.suffolk.gov.uk/n2t-the-hiorns-report.pdf)

<sup>11</sup> <https://www.nationalgrideso.com/document/304496/download>



be considered under Electricity Act 1989 Duties (Schedule 9), NGET it is obliged to build new lines and substations **only** where the existing transmission infrastructure cannot be upgraded and NPS EN-5 requirements, paragraph 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”* cannot be met.

6.3.5. Further, in line with the considerations in para 6.4.4 above, it must be demonstrated by NGET that it has fully investigated the scope to increase the capacity of the existing grid. There are new technologies which give rise to significant capacity increases using existing towers and infrastructure. These include HVDC overhead lines, which can double the capacity, and about which we submit an additional paper by engineer Mike Parr. The following are also recognised Grid-Enhancing Technologies (GETs):

- 6.3.5.1. dynamic line ratings;
- 6.3.5.2. advanced power flow controls
- 6.3.5.3. advanced conductors. In this regard, we expect NGET to set out what is next with TS Conductor, which it part-owns, and which is seeking UK licensing.
- 6.3.5.4. transmission switching

6.3.6. There must be scrutiny and interrogation of NGET’s rationale and costings and this document will be copied to Ofgem. As set out below, NGET’s costings are not transparent. Nor is NGET’s rationale for overhead lines Norwich to Tilbury consistent with its approach elsewhere. NGET’s rationale for sub-sea cabling elsewhere (Eastern Green Link) is set out below. Note how it contradicts with the approach in the Norwich to Tilbury project and concludes that overhead lines do not meet the need:

- 6.3.6.1. *(Paragraph 5.0.1) The largest capacity AC technology option that can be used on NGET’s transmission system consists of two 3,465 MW transmission circuits that are supported on a single set of towers (6930 MW double circuit capacity). The largest HVDC capacity systems that can currently be accommodated on our transmission system are 2,000 MW HVDC cables.*
- 6.3.6.2. *(Paragraph 5.0.2) Power flows on AC transmission system circuits cannot be controlled to the same extent as can be achieved using HVDC connections. This lower level of controllability can result in higher power flows particularly during transmission system fault conditions.*
- 6.3.6.3. *Taking account of the potential for higher power flows that could be expected, therefore to provide the potential equivalent capacity, the AC option would need to consist of a high capacity (6,930MW) double circuit route to meet any high loading during fault conditions.*
- 6.3.6.4. *(Paragraph 5.0.3) The required capacity HVDC links over the proposed distance have comparable capital costs, but much lower lifetime costs than the alternative onshore AC option in this case.*
- 6.3.6.5. *It is also recognised that delivery of an onshore solution with a long route length, carries much higher delivery risk than the HVDC reinforcement proposals (EGL3 and EGL4) that are currently being progressed. The use of overhead lines is not considered to be feasible because they cannot be delivered by the required 2030 timescale.*

6.3.6.6. *Consequently, an option using overhead line technology is not considered to meet the*

## 7. Costings

- 7.1.** Given the failure by NGET to supply transparent costing information (also a failure against Gunning Principle number 2<sup>12</sup>), it is very difficult to compare alternatives in any sensible manner. We note, too, that some significant costs that do apply to overhead lines but not underground or offshore have not been included in the N2T costings. **This results in artificially low overhead line costings.**
- 7.2. Pylons under-costed.** NGET tells us that the N2T pylons cost c£900m. However, there is no cost breakdown and thus it is impossible to respond properly to the consultation, the lack of information being a breach of Gunning Principle 2 (sufficient information to give ‘intelligent consideration’). We also know from conversations with NGET that this does not include some very significant cost elements. We highlight just four cost elements which are neglected or likely under-estimated by NGET:
- 7.2.1. the cost of community benefits. This is a scheme supported by both the Conservative and Labour parties and it is therefore more likely than not that the scheme will come into play. An estimate based on the number of homes within proximity to the N2T pylons suggests that the scheme could cost at least £200m. (Note that for undergrounding, community benefits are not payable.)
  - 7.2.2. the cost of Biodiversity Net Gain. This could be extremely significant if NGET is forced to compulsorily purchase land and/or by statutory credits. A guesstimate based on the number of credits required for the A12 widening scheme suggests that BNG could cost NGET many hundreds of millions of pounds. (As there is currently no Marine Net Gain scheme, this means that it will not be payable for offshore options)
  - 7.2.3. NGET neglects to consider any Treasury Green Book calculations for externalities (see below) such as cost to businesses and homeowners caused by the pylons. These costs will be very significant, based on evidence that we have received from businesses, home owners and estate agents.
  - 7.2.4. We believe that compensation payments are likely significantly downplayed in NGET’s costings and may well be based on minimal tariff payments as per their standard scheme. In fact, there are likely to be very significant compensation challenges along the route, both on- and off-line and also challenges to NGET’s flat-rate payments which are fourteen years out of date.
  - 7.2.5. A comparison with the Hinckley Project would suggest that instead of c£900m, the N2T project would cost around £2.5bn. NGET must explain why N2T is so much cheaper, especially given that it has been acknowledged to be its longest, and therefore most complicated, project.
  - 7.2.6. We understand that the project contingency is only 10%. This is far too low. A large engineering project of this type would require a contingency of 44% under Treasury Green Book guidance. Although NGET tells us that Green Book guidance is not applicable, it has been cited by the Planning Inspectorate in the planning context before. This was in the 2020 Inspector’s letter for the North Essex Garden Communities, in which he said:

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<sup>12</sup>“there is sufficient information to give ‘intelligent consideration’ The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response”

7.2.7. “217. The Treasury’s Supplementary Green Book Guidance on optimism bias (April 2013) advises that an upper-bound optimism bias allowance of 44% for capital expenditure on standard civil engineering projects provides a starting point and reasonable benchmark. It reflects the average historic optimism bias which research found to occur at the outline business case stage”

7.3 Note too, that NGET says the following about HVDC cabling in its Eastern Green Link consultation<sup>13</sup>, in paragraph 5.0.3: *“HVDC links over the proposed distance have comparable capital costs, but much lower lifetime costs than the alternative onshore AC option”*. Meanwhile, the NG ESO East Anglia Study 2024.

7.4. See Appendix for itemised list of just some of the items that need to be costed and published in order for a true comparison of alternatives.

## 8. Alternatives and how they meet policy requirements

Policy	HVDC underground N2T	HVDC sub-sea N2T	Bradwell landing point	Integrated offshore grid
EN1 4.3.25: important & relevant	Yes	Yes	Yes	Yes
EN1 4.3.26: accordance with NPS's	Yes	Yes	Yes	Yes
EN1 4.3.27: can proceed	Yes	Yes	Yes- willing landowner; easements in place, sub-sea duct in place; brownfield with disused infrastructure.	Yes – with gov't support & mid 30's circuit breakers
EN1 4.3.28: is not vague or immature	Yes	Yes		Only two
EN1 4.3.29: Submitted before DCO	Yes	Yes	Yes	Yes
EN5 2.9.23: Reduces potential for widespread adverse landscape/visual impacts	Yes	Yes	Yes	Yes
EN5 2.9.24: cost & feasibility	Cheaper over the lifetime than N2T OHL and scores well on ESO criteria. Preferred by NGET elsewhere in the country.	Presented as significantly more expensive than OHL by NGET but see Cost section. When costed by ESO, cost differential far lower.		Integration is cheaper overall than radial connections. It reduces infrastructure onshore & offshore by 50%. Therefore harms to communities & environment are reduced.

<sup>1313</sup> <https://www.nationalgrid.com/document/151426/download>

EN5 2.9.24 Weighed against adverse implications of the OHL proposal	Favourable when compared with OHL	Favourable when compared with OHL	Favourable when compared with OHL	Very favourable when compared with OHL
Electricity Act 1989 Schedule 9. “have regard to the desirability of preserving & protecting natural beauty, flora, fauna & geological or physiographical features, sites, buildings and objects of architectural, historic or archaeological interest; and ...do what [they] reasonably can to mitigate any effect.”	Very favourable when compared with OHL	Favourable when compared with OHL	Favourable when compared with OHL	Very favourable when compared with OHL

## 9. Conclusion

- 9.1. The SoS must weigh up the harms of the NGET’s N2T overhead line proposal versus the costs and benefits of the alternative(s) (2.9.25). It is clear from our analysis that the benefits of the alternatives significantly outweigh any harms created and that on the other hand, the harms of N2T are very significant and outweigh the benefits. Alternatives have not been consulted on and where some alternatives have been described, the information is insufficient for stakeholders to give intelligent consideration of them.
- 9.2. Some key policy-compliant alternatives have never been appraised by NGET. Material alternatives have been ignored in back-checking exercises. And backchecking has been used to justify the original decision to pursue the N2T overhead line preferred option on a preferred route alignment.

# APPENDIX

Non-exhaustive list of costs that must be published in a transparent breakdown:

£500 land access fee

Advertising

Aggregate

Biodiversity Net Gain

Cables

Carbon offsets

Community benefits

Compensation business loss

Compensation crop loss

Compensation house purchase

Compensation per pylon

Concrete

Consultation cost 2022

Consultation cost 2023

Consultation cost 2024

Consultation staff accommodation & transport

Contingency

Existing infrastructure protection/moving

Fencing

Fisher German

FREEPOST

Haul road construction

Haul road dismantling

Insurance

Judicial review

Key fobs

Land Agents

Lane widening

Livery

Livestock rehousing

Machinery

Notices

Overtime

Piling

Planning & Development Consent Order

Pothole repair

Postage & cost of packs

PR agencies

Property

Pumps

Steel

Sub contractors

Substation

SuDS/attenuation ponds

Surveys

Tree surgeons

Vet bills

Worker accommodation & transport

# REPORT ON DEFICIENCIES in the process of 'NORWICH to TILBURY' Statutory Consultation



**Less than one month to go to have  
your say on Norwich to Tilbury**

We've extended our statutory consultation to give people additional time to have their say after the General Election. It will now close at 11.59pm on Friday 29 June 2024.

*Lack of signage at Public Information Events (Chelmsford 27 April 2024) and venues too far from the pylons projected route. Wrong date on update sent Friday 28 June (actual date 26 July)*

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<sup>11</sup> <https://www.nationalgrid.com/electricity-transmission/document/154541/download>

## 1. Executive Summary

1.3. The issues that we highlight in this 'Norwich to Tilbury' Statutory Consultation report can significantly prejudice stakeholders in several ways and represent a breach in the Equalities Act 2010:

### 1.3.1. Reduced participation

1.3.1.1. **Timing and Duration:** The overlap with the local election season and the shortened consultation period means that many stakeholders, including local councillors and residents, had limited time and opportunity to engage with the consultation process. This reduces the breadth of feedback and the representativeness of the responses.

1.3.1.2. **Scheduling and Accessibility of PIEs:** Holding Public Information Events (PIEs) far from the pylon route, poorly signposted, difficult/impossible to access via public transport and scheduled during work hours limits the ability of a broad cross-section of the community to attend and voice their concerns. This skews participation towards those who are retired or not working, thus excluding younger and working stakeholders.

### 1.3.2. Insufficient and misleading Information

1.3.2.1. **Lack of documentation:** The absence of critical documents in libraries and at PIEs, coupled with the difficulty in obtaining physical copies, prevents stakeholders from fully understanding the project's scope and impact. This hampers their ability to make informed responses.

1.3.2.2. **Misleading statements and inaccurate 3D Imaging:** Incorrect information provided by National Grid (NG) representatives and the misleading visual representations of the project's impact can lead stakeholders to form opinions based on false premises. This compromises the quality of their feedback and can mislead decision-makers.

1.3.2.3. **Wrong consultation end date on community update sent Friday 28 June.** Stated Friday 29 June instead of 26 July.

1.3.3. **Inadequate consideration of alternatives. No Alternatives Presented:** The failure to present and consult on alternative solutions, such as offshore or underground cabling, limits stakeholders' ability to weigh different options and advocate for less harmful solutions. This can lead to a biased consultation outcome favoring NG's preferred option.

### 1.3.4. Legal and procedural deficiencies

1.3.4.1. **Inadequate adherence to Gunning Principles:** The consultation fails to meet several Gunning Principles, particularly the requirements for sufficient information and adequate time for consideration and response. This legal deficiency can prejudice stakeholders by invalidating the consultation process and undermining their ability to influence the project's outcome effectively.

1.3.4.2. **Breaches of the Equality Act 2010,** an Act which is intended to ensure public sector consultations are inclusive. As a Statutory Undertaker, providing an essential national service regulated by Ofgem, NGET must adhere to this Act. This report details many examples of people disadvantaged by the consultation, most notably the elderly without access to cars or the internet. To give one example, 82% of 479 residents surveyed in just Roydon & Bressingham said they had not attended National Grid public information events, citing reasons due to location of the meetings, the times the meets were held, lack of interest, and not being listened to. Many of the older residents or those that are disabled felt excluded as they were unable to get to the workshops and due to technological restrictions, they felt they could not complete the complex online forms.

1.4. The highlighted issues collectively prejudice stakeholders by reducing their ability to participate meaningfully, form informed opinions, advocate for alternatives, protect their economic and environmental interests, and manage the emotional impact. Addressing these deficiencies is essential to ensure a fair and comprehensive consultation process that genuinely reflects the concerns and needs of all stakeholders.



## 2. CONSULTATION AND ITS ORGANISATION

- 2.1. This document is based on the National Grid (NG) Statement of Community Consultation (SoCC) April 2024, to which section numbers will refer.
- 2.2. The consultation was launched into the local election season (Election Day, 2 May 2024). This means that many councillors/candidates were unable to focus on the consultation and assist their residents to understand it. In some cases, candidates were advised not to campaign on the pylons issue during the election period
- 2.3. Government guidance on consultation assumes a 12-week consultation period. This was only 10 weeks; had it been longer the candidates mentioned above would have had more time to serve their constituents. And, even better, this one could have started on 3 May, after the elections, and run for 12 weeks. As it was, there were also interruptions of two Bank Holiday Mondays and a school half term during the period, which cut the period even shorter. (For reference, the 2023 Consultation was even more inconvenient, launched into school holidays and harvest season).
- 2.4. The Public Information Event venues have again been too far from the pylon route, difficult to get to, badly directed and sign-posted and with access to minimal public transport. Held mostly on weekdays, at a time of day when most people were at work, or commuting, the demographic of the attendees was therefore skewed towards retired people.
- 2.5. The Libraries were not as near to the pylon villages as they could have been (e.g. Writtle), nor did they hold enough (or any) copies of the various documents. They did not hold any of the larger documents, and those they did have were rarely well displayed, but tucked away and had to be requested.
- 2.6. The 2023 interactive map remains active<sup>2</sup> and is the second Google result in a search. This could cause confusion and, due to the absence of draft order limits and traffic access information, could heavily mislead about the scale of the project.
- 2.7. There were very late changes (see Appendix xi, Errata) and an error in the end date of the consultation sent in a community newsletter.

### 2.8. MISLEADING STATEMENTS

- 2.9. There have been multiple misleading or evasive comments from National Grid staff over the last few years and similarly misleading advertisements or advertising features (see Appendices0).
- 2.10. One which seems to encapsulate most of them is the following from Project Leader, Liam Walker, in the Basildon / Canvey Island / Southend Echo in April, at the start of their latest consultation: *"By delivering this project (Norwich to Tilbury) we'll be able to connect new sources of low carbon **energy to homes and businesses across East Anglia and Britain**"*
- 2.11. This is incorrect: Only 8% of the wind farm power is needed within this region, and it can be boosted in ways other than pylon planting and piecemeal infrastructure.
- 2.12. The vast bulk of the energy, 92%, will be used in London, the Southeast. There is no excuse to desecrate the local farmland, environment and historic surroundings of East Anglia forever. There are better ways, which we continue to promote.
- 2.13. This sums up the wrong-headed replies to which we've been subjected over time.

<sup>2</sup> <https://experience.arcgis.com/experience/4edc74b6e50e4e27bd2c6ffc7929414f/>

- 2.14. It must also be noted that this project is set against a very different environmental and legal background than when pylons were first built in the 1920s. Things have also moved on in industrial and technical terms. Countryside, farmland and wildlife have been drastically reduced in the last 50 years, and can no longer be abused. The protection laws are growing, and the mitigations becoming outdated and virtually impossible. According to the latest *State of Nature Report* (27 Sep 2023) the UK is now one of the most nature-depleted countries in the world, showing a “devastating decline”.
- 2.15. National Grid might potentially be about to be allowed to grub out as much as 6m hedge plants, and 1.6m trees, including protected and veterans, and to ruin acres of farmland, whilst the two men who sawed down the Sycamore Gap tree are under arrest for criminal damage. How can this corporate vandalism be allowed?
- 2.16. What follows is a collection of verbatim comments, combined with reports from attendees and Committee Members, on various aspects of the 2024 Consultation, hence variety of different formats.

### 3. LIBRARIES

#### 3.1. ['Inspection Points']- in no particular order

- 3.1.1. **Writtle** - No NG documentation – asked Librarians to obtain some. They agreed
- 3.1.2. **Chelmsford** - Talked to Librarians and completed Library questions and feedback form asking for NG documentation to be sent to all libraries on the Pylon route in Essex. This should not have been our problem, NG should have arranged for documents in more, closer, libraries than they did.
- 3.1.3. **Stanway** - They had 1 (Reference Only) copy of Project Background Doc, and non-tech Summary of PEIR (apparently the full version is 6,000pp). Surely a selection of the libraries should have had the full PEIR version available to view.
- 3.1.4. To take away, there were very few copies of the following:
- Community Newsletter - including Map
  - Statement of Community Consultation
  - Feedback Questionnaire

- 3.2. **Colchester** - The same in Colchester library. Very poor. Didn't exactly fit the 'Inspection point' title they use in the Community Newsletter. Fairly inconspicuously located on a shelf with consultation docs for other schemes such as the Anglia Water project. Photo for reference in **APPENDIX V**.

## 4. PUBLIC INFORMATION EVENTS

### 4.1. Introduction

4.2. The following is taken from the SoCC:

4.2.1. *“Public information events will be held for communities to find out information about the proposed Project ...” and*

4.2.2. *“The events will be held at suitable, publicly accessible venues that are within or near to the Primary Consultation Zone (PCZ) (See 5.6.1 of SoCC)*

4.2.3. We do not feel these qualified as “for communities” –because several are neither “within or near the PCZ,” nor particularly accessible: bad directions, bad signage, long way, minimum public transport and, at Chelmsford, a long walk from car park to venue.

4.3. Several complaints about the **timing** of the events, in work hours and midweek. This caused a very skewed demographic attending: mostly retired, as younger people at work, college and school. Not fair to hundreds more who would have wanted to be there.

4.4. There were events where you could not “drop-in” because they were **too far** and inaccessible from the small rural villages whose inhabitants are affected by and closest to the route.

4.5. There were repeated comments about how angry, upset and tearful many people have been over the effects of this proposed, highly destructive, project. These emotions are caused not least by the impotence of consumers in the face of the ignorance and sometimes arrogance of the staff inside the PIE venues.

4.6. There are often only a couple of people, or even only one, in the hall capable of answering satisfactorily the questions that we ask. And, inevitably, long queues build up to talk to those who know what’s going on.

### 4.7. Basildon, 24 April

4.8. 3D renders - All the trees and hedgerows will be grubbed out and not mature unless NG are going to replant them? Timing of the actual work - if this is in nesting season then birds are going to die in the hedgerows and our native birds will be even more depleted.

4.9. Not enough hard copies of NG documents for people to take away

4.10. Enough PIEs, in the right places?

4.11. We do not feel that NG have provided enough PIEs for the length of the pylon route. There was an event in Writtle another year, and they haven’t been back since. Again, as Writtle has 20 pylons, and maybe more, surrounding it, it would challenge their choice of location for the PIEs. I am sure Writtle college would have given them a room, maybe at the Equine unit (they plan a haul road going through the college)

### 4.12. Brentwood, 25 April

4.13. One couple were concerned about the health effects, particularly the noise - they were told that “it would not be an issue as ‘quiet’ pylons were being used”. NG did not elaborate on how that was possible.

4.14. Several people queried with NG the house price devaluation, and have been told that this is not correct, house prices may even go up!

4.15. A farmer in the Walthams area has 21 pylons due to run through his land. Significant quantities of weeds would grow around the pylon bases, assume 12x12m for getting the tractor

near. Multiply [REDACTED] [REDACTED] a lot of time and effort to control weeds manually to prevent crops being affected.

- 4.16. Timing of the events cropped up a lot, during the working day for the most part, giving people very little time to get across after work. Especially relevant in commuting areas.
- 4.17. Limited public transport links
- 4.18. 5km from the actual pylon route (**see 5.6.1 SoCC**, and above), like Grays
- 4.19. **Chelmsford Race Course, 27 April**
- 4.20. Writtle Parish Council emailed NG after this event, to complain of its many deficiencies, and request an event at Writtle, which would be very badly hit by the pylons, and where one was held for an earlier consultation [**APPENDIX I**].
- 4.21. This venue was not in Chelmsford, but well outside, at the racecourse, so not easily accessible.
- 4.22. Incorrect post code (several people), took us to the wrong racecourse entrance where I was turned away and redirected to the right one. Waste of time
- 4.23. No signs visible from the road. Arrived in car park, still no signing whatsoever. (many comments) Nearest building is not the right one, but happened to meet people walking towards me, and asked if they could advise. They were just back from the event, and pointed out directions to me, probably a 5 minute walk to the event building, up and down a winding route. Eventually a one and only sign outside the door.
- 4.24. If it had not been for campaigners there en masse, nobody would have known where to go.
- 4.25. The arrival at the car park was a problem, and too far to walk, for elderly, infirm or disabled people. It transpired they could be given a buggy to the event building, but first had to know it was on offer, and then walk across to the building at car park level to find someone to transport them. Really not good enough.
- 4.26. NG pre-paid envelopes: ran out half way through the day, which made it less easy for people to return their Consultation responses and comments.
- 4.27. The 3D screen was set up in front of a window, so made it quite hard to see it properly. We suggested they move it against a wall at the next venue, to improve visibility.
- 4.28. Staff inability to answer questions when unsure, saying it's not my area of expertise - but not taking details to then find out answers, generally being dismissive. (A "horse expert" answered that the rider should hold onto the mane when riding under pylons to avoid an electrical contact ...)
- 4.29. A lack of consistency of what would happen post-project – e.g. farmers being asked if they would like to keep the haul roads. Makes us wonder if taking away haul roads has been costed - significant cost impact
- 4.30. There were issues with the information they were providing, didn't answer questions
- 4.31. As mentioned at other venues, e.g. Lawford, people driven to tears by the rehearsed, repetitive, and often wrong, replies from the NG representatives.
- 4.32. **Gislingham, 30 April**
- 4.33. Anyone planning on getting a bus to Gislingham for NGs Consultation tomorrow (Tues 30 Apr) ... Please be aware that the bus service does NOT run to/from Gislingham on a Monday or a Tuesday.

- 4.34. Consultation is not to discuss alternatives, merely to tweak the pylons project.
- 4.35. **Q1** NG EGL1-4. NG are spending billions of pounds to have offshore and underground. Why does E Anglia have to put up with pylons and a budget of only millions? “They had to go with the cheapest option. (Not true: Ofgem). East Anglia needs 6 gigawatt cables. EGL 1-4 need less. Quickest option as offshore would need huge HVDC converter stations which would take longer than pylons to build. “
- 4.36. **Q2** Do pylons give people cancer? “Studies show that this has only been in children and inconclusive. The electromagnetic fields given off are within government guidelines.” He did admit the radius of electromagnetic field is less if underground. (I did comment current government guidelines allow micro plastics in our water. Technical advances in the future will show how bad it is for us and levels will be lowered. Similarly, living near pylons will have more studies and science will likely prove them cancerous.) NG health expert said he understood my argument.
- 4.37. **Q3.** Why should E Anglia be treated as a third world relative in the UK with pylons when the power isn't even for E Anglia?; **A.**The power goes into Tilbury and back out to Bramford to be redistributed to East Anglia
- 4.38. **Copdock, 1 May**
- 4.39. Like most of the event venues, not near the route (7k), and not easily accessible for people from villages affected. (**see 5.6.1 SoCC**)
- 4.40. No signs visible from the road – as with other venues.
- 4.41. No answer to questions asked at previous consultations and via previous feedback
- 4.42. Limited hours availability severely constrained the ability to engage with this significant issue.
- 4.43. Staff unable to answer specific questions
- 4.44. Already made their minds up, well briefed with “pat” answers
- 4.45. This consultation has been extremely limited – focusing on what appears to be a done deal
- 4.46. I am a Belgian national and lived in Belgium and France (as well as here). Please look to our neighbours on how to do this
- 4.47. I would like an independent review of both options – cost impact etc
- 4.48. Interactive map and main map unable to find our post code. It has existed for 27 years!
- 4.49. **Needham Market, 3 May**
- 4.50. Felt like a presentation rather than a consultation
- 4.51. All questions were answered with comments that were preconceived and not answering the question
- 4.52. We are being railroaded into accepting these pylons without a proper investigation into offshore cabling
- 4.53. Question on effect of structures on radio propagation and background radio frequency emissions - *(from a local radio operator for his club he was most upset they did not know what a Faraday cage is - will this also impact the model aircraft people?)*
- 4.54. Will NG take any notice of the public?
- 4.55. You need to present multiple design options with pros, cons and costs (DTP design consultant)

- 4.56. NG arg [REDACTED]ns cheapest short-term option is necessary and therefore there is only one option
- 4.57. Total sham consultation. Disappointed no information regarding other options i.e. offshore , underground etc
- 4.58. The environment survey company was only commissioned to do a specific survey - didn't do or even consider any alternative - the only consideration has been pylons.
- 4.59. Lawford, 4 May**
- 4.60. Considering the particularly enormous impact on the village of Ardleigh, it's inexplicable that a PIE was not held there. There is a large village hall, quite capable of hosting one.
- 4.61. I was drained seeing so many people so very upset (I should have dragged an NG member of staff outside to see).
- 4.62. It makes me feel emotional thinking about one young girl, with her mother saying 'it's her future'. They were both in tears.
- 4.63. If you had stood outside the recent Lawford PIE you would have seen many people leaving in tears.
- 4.64. Another campaigner said: "I can't remember ever having seen so many adults angry and/or in tears about what might happen to their village. It was utterly heart-breaking."
- 4.65. People had planted an orchard at their farm which will probably be lost because of a haul road. They also expect to lose a significant amount of trees.
- 4.66. The 3D visualisations that are being presented by NG are poor. Buildings are represented as grey blocks. This desensitises the images as people are not seeing the pylons as a backdrop to real buildings. For example, the Grade II\* listed church in Ardleigh and the medieval cottages adjacent to it look like industrial units. The corresponding images of the ground were also very unclear making it very difficult to relate to the actual geography (the data was obtained from Google Earth).
- 4.67. The overhead cables also do not appear as prominent in the screen images as they are in real life. We confirmed this to ourselves on our travels today (sad isn't it!).
- 4.68. Considering Lawford was one of the closest PIEs to the proposed trenching of the AONB, there were NO trenching/drilling experts at the Lawford PIE. When asked why, was told because it was a bank holiday.
- 4.69. I asked NG why we couldn't be presented with models that were comparable in quality to those presented at the North Falls statutory consultation. These were incredibly detailed and realistic. I was told that it wasn't possible to produce in such detail for such a long route. To increase the detail, I can't see why the model for the route couldn't be broken down into sections like the maps are.
- 4.70. Reactions from people: People shocked at the scale of the works. Still a lack of awareness of the project and the impact. A lot of people felt that they were not being told the truth by NG and that they were being fed rehearsed lines. Some people still not aware that NG is a private company. People were angry that they hadn't been listened to. A number of people left the event in tears including a mother and her young daughter. Really horrible to see.
- 4.71. There was some discussion about the fact that people take the TV reports from NG stating offshore too expensive etc at face value, whereas the reality is much more complex.
- 4.72. Grays, 8 May**

4.73. Confusion [REDACTED] sent a "NG Information Pack" which had the wrong timing (4-7pm) for the Grays event, rather than 2-7pm. Had to phone NG to verify and make aware. A real shame if the wrong info prevents people getting there.

4.74. Usual lack of signage at the road entrance.

4.75. There were a maximum of 30 people there, same as last year. Almost certainly because it is too far away (5km) from the pylons route, like Brentwood.

4.76. Most who did come in had no idea, but were all signed up and petitioned in short order.

4.77. But 8 were members of Orsett Golf Club trying to change the route. Sat round a table/3-D screen with a couple of NG people. Golfers were bemoaning Ancient Woodland and SSSI which - under pylon circumstances - they regarded as an obstacle to the economic viability of their Club. One asked NG staff whether they could go through/over them: NG replied "Well, we have to try to avoid them".

4.78. The usual replies from NG in answer to any questions: "Sorry not my area of expertise".

#### **4.79. Witham, 14 May**

4.80. Twenty minutes by car from Aldham, no public transport. Hard-to-find place. Very limited free parking - hard to find car park, and had to pay for it. Minimal, small signage, barely visible from the road, and unreadable if passing by car. People reported similar from other venues.

4.81. As mentioned from other venues, people angry and in tears at the sight of pylons destruction.

4.82. A farmer handed a letter to Simon Pepper at the Chelmsford PIE (27 Apr). Still no reply by today

4.83. Venue is not a good one. Only about three parking spaces. Car park requires payment and is a short walk away. As someone pointed out there are at least two rural village halls with parking on the route of the pylons which would have been better

4.84. One couple met the cables engineer. He told them how few cables are needed for HVDC and how closely spaced they can be. But.... he had not even heard of the ESO March 2024 report

4.85. One farmer received a notification of start of Statutory Consultation in the post today at 1pm, only three hours before his local PIE closed

4.86. Farmer has asked, but received no answer, about the amount of noise (in decibels) produced by pylons in various atmospheric conditions

4.87. Another man had asked at Chelmsford for the effects of EMF, and was told that an agent would call to see him and discuss. Nothing happened, so he left details again today.

4.88. "Not my area of expertise" heard again, several times from some members of staff.

4.89. "Some staff walked away from us, not offering help nor keen to engage, often didn't know the answers we needed. They couldn't find the correct map for us; not enough 3D screens."

#### **4.90. Langham, 16 May**

4.91. Considering the particularly enormous impact on the village of Ardleigh, it's inexplicable that a PIE was not held there. There is a large village hall, quite capable of hosting one.

- 4.92. No sign [REDACTED] Wouldn't have known they were there if not for the campaigners' placards.
- 4.93. One person attended to make NG aware of archaeology in her area, and was told by the "archaeology expert" that she needed to notify Historical Environmental Records and Council Heritage Officer if she needed NG to take notice of it. This is the first that anyone has heard of this. It's what consultations are for.
- 4.94. When asked about scenic views, NG member of staff responded they were not counted.
- 4.95. An elderly man, too ill to attend, was represented by his daughter. His cottage, and home for 40 years, not only was due to have a pylon very close, but a haul road too.
- 4.96. Someone maintained they had been told lies: 'the wind farms are dictating the use of pylons', 'lots of mortgage lenders are fine with pylons around' and 'costs include repairing ALL our rural roads'.

#### **4.97. Great Bromley, 17 May**

- 4.98. I asked if I could assume that the tree/hedge work would be carried out outside the bird-nesting season, which is becoming longer. I was told that if a nest was discovered, they would stop work ...
- 4.99. No signage from the road, as usual. Drove straight past and had to come back round.
- 4.100. Same as other venues: out of the way, questions not answered, people upset and angry
- 4.101.** One campaigner gave a brief, impromptu speech at the end of this last PIE. But they were instructed that videos were not allowed. People were also prevented from taking photos. It is debatable if these actions were legitimate in a public building at an event open to the public.

### 5. 3D IMAGING (comments from the public)

- 5.1. 3D renders are inaccurate (heard multiple times). They show mature trees which would not remain, and either trees are larger or pylons smaller, ie not scaled, to try to hide the horror. A couple had photos of their current view versus the generated pylon image and a whole woodland had moved round, thus hiding the pylons they are so worried about.
- 5.2. Complaints about the 3D screen, which some people found unrealistic – the differential between tree and pylon heights, for instance. One visitor was told it was the first time the staff had used it, and that NG were not responsible for it: "it had been designed by a company called Atkins CGI."
- 5.3. The 3D modelling was misleading
- 5.4. 3D simulation of distant views was ineffective: pylons disappeared from the screen after 2.5km, yet in reality they would be visible for that resident up to 8km, yet they were not able to be shown the correct effect.
- 5.5. When viewing the AI image at the info events, of how pylons will look, make sure you are being shown the image from 1.6m height NOT the 4M height they started out showing me. Makes a big difference.
- 5.6. Their AI images are rubbish. Showed me a point from my house where the new line appeared to show the same view as the existing line, yet it is known that the new line of pylons will be closer.
- 5.7. The 3D modelling added a hill into my street which hid the pylons behind it in the distance. We live in a completely flat street with no hills at all anywhere near us. Also, they showed us summertime



with trees with [REDACTED] year there are no leaves on the trees. It was a massive misrepresentation of what it will actually look like.

- 5.8. This is a favourite trick of developers doing consultations and planning illustrations. They 'forget' that existing trees are most likely deciduous and will not block views of developments for at least half the year - if indeed the trees survive the development.
- 5.9. The AI representations are wholly inaccurate with regard to the visualisation of trees and hedges, since very many of them will be removed during the construction process
- 5.10. Smoke and mirrors as usual. They should have representations with hedges/trees ripped out, haul roads installed, lanes trashed by vehicles and noise effects to top it off
- 5.11. Wasn't impressed yesterday, 3D from my house looked like mostly trees and some really faint tops of pylons in the distance. I wasn't aware they could change the height, and they didn't mention it...
- 5.12. Having seen their visualisation of Bramford substation from Tye Lane, a view I see several times a week, I know it is rubbish. Apparently prepared 2 or more years ago from 2021 data when of course there was only a small building there. The data used was out of date. I gave up
- 5.13. It was felt that it should be possible to layer over what the landscape would look like during the construction process, and when hedges and trees have been removed for construction.
- 5.14. Pylons/tree heights not necessarily accurately to scale
- 5.15. Resident complained that pylon across field from house is shown too far away on 3D
- 5.16. Video screen of her home was not realistic. Top of pylons hidden in clouds, cables so faint, almost invisible. Garden unrecognisable, looked like enormous park with hundreds of trees
- 5.17. Another landowner brought photos and own video to compare with the NG 3D, which showed up all the inaccuracies.
- 5.18. It is wrong that the visibility (see Map at **APPENDIX IX**) on the PIE 3D screen was capped at 1.5km, when it's known that they can sometimes be seen from 8km. (LM)
- 5.19. The 3D simulation shows the pylons and wires in a light grey. I showed a Google image of an existing very dark grey pylon, there was total silence from NG employees.
- 5.20. What I found most misleading when I attended the forum at Brentwood was the 3D interactive map of the line of the pylons. When I asked someone from National Grid to explain to me why their view of the pylons from my house was nothing like reality and I showed them the view on Google Maps, I was told that they had outsourced it to another company and they didn't use Google Maps as their baseline. I questioned what was the point of commissioning an inaccurate map, unless it was to placate people with unrealistic views of the actual impact of the pylons. He had no answer for me, just saying it was only a guide. I then asked to see the map with different options ie the large pylons, where there would be fewer of them, versus the smaller pylons, but this was not an option. But to those of us who are impacted by the pylons, a visual guide is what we needed to see, rather than a paper map, and you have to question their interpretation of impact rather than a layperson's.
- 5.21. In addition, see **APPENDIX** for some shockingly bad visualisations of the impact of the project by NGET including pylons the size of a telegraph pole, pylons half the size of existing 50m high pylons, and viewpoints with no view.

## 6. INFORMATION

- 6.1. The documentation is not indexed and it is virtually impossible to navigate the evidence base.
- 6.2. Initially NGET did not include existing power lines on the interactive map. This mean that the full impact of 'wirescape' could not be determined, in line with Holford Rules. They were added later in the consultation period.
- 6.3. Only residents within 1km, the Primary Consultation Zone (PCZ) of the draft order red line, were notified by NG about the consultation. Yet the Zone of Theoretical Visibility maps make it clear that the pylons can be seen from over 3km, sometimes up to 8km, away. This probably applies over most of the route in the flat lands of East Anglia. (As an example, a map of one section of the route, based around Aldham, Essex is shown at APPENDIX IX). From this, it would seem that a far wider impact area should have been covered. Residents in the Secondary Consultation Zone (SCZ), which is a 4km buffer around the red line limit of the draft order limit, should also have been notified. (LM = source)
- 6.4. NGET has refused to share GIS files of the route and draft order limit.
- 6.5. Apr 30 - Resident in Low Common, Bunwell NR16 1TG was told there had been a Bats Survey, but was not allowed access to the results. No transparency.
- 6.6. NGET employees persist in telling the public that government insists on pylons and that the cheapest option the only one accepted by Ofgem.
- 6.7. One document I was trying to navigate was impossible: 2,500 pages, and NO INDEX.
- 6.8. One farmer had agreed a pylon route with NG agents, and was then shown the wrong route at a PIE.
- 6.9. How can it be a consultation when the map and info are incorrect or poor, it's all very frustrating!
- 6.10. Requested documents not sent. Limited access to the full PEIR document is problematic. Having to wait "a number of weeks" – beyond the Response deadline – and in addition to have to pay up to £500 for access are both completely unacceptable. This issue still unresolved, 3 weeks later **[See emails at APPENDIX I, II, IIA & III]**
- 6.11. NG documents lacking Index and limited Contents make them extremely difficult and time-consuming to navigate. Some of the documents are up to 6,000 pages. It almost seems as though they don't want us to be able to read through them.
- 6.12. NG documentation is impossible to navigate and so virtually unusable
- 6.13. We have been asking about Mental and Physical Health issues since 2022 (including in the ESNP official consultation response), and have still had no reply from NG.
- 6.14. I put my name down for some documents and we'll see when they actually arrive. This shows the lack of confidence in NG efficiency.
- 6.15. May 10. I asked the nice man at the door a question about how to find certain information, but he had no idea. He said speak to Simon Pepper. I queued for ages, but had to leave before I got to the front. (This happened often).
- 6.16. I also emailed the contact team the same question last week, needless to say, no answer yet.
- 6.17. Many reports from all down the route of duplicate copies of original NG documents (Community Newsletter + forms + large Freepost envelopes) received again on 14 May. By Yodel – expensive and unnecessary, first received on 9 April.
- 6.18. The above delivery was signed for and Yodel took photos of recipients; they found it intimidating.
- 6.19. There were post-it notes put on front of many of the NG documents so staff could find what they were looking for (**APPENDIX VI**). That says it all. No index.
- 6.20. A couple only discovered at Witham PIE that they have a haul road across their land. They hadn't had any prior communications from NG.
- 6.21. Different answers and mixed messages reported from NG staff on a regular basis
- 6.22. Boyton Hall, Roxwell worried that they may not be able to hold the Essex International Scouting Jubilee, due in June 2028. Just one of many predictable business interruptions.
- 6.23. Still awaiting response to questions in NG email from 3 weeks ago.
- 6.24. Environmental surveys from November 2023 still awaited.
- 6.25. Farmer in Margaretting had environmental survey done by Arcadia: were not given/not allowed to see survey. Told they were supposed to receive it within 30 days.

- 6.26. Elsewh [REDACTED] vironmental survey allegedly to be available “within 14 days”; NG denies having received it from surveyors.
- 6.27. Finally received some maps from NG that we requested for last week’s meeting. Surprise, surprise, they aren’t even of Boxted. They’ve sent the wrong ones ...
- 6.28. 28 May 2024 There has been no formal announcement of extension of consultation period due to General Election - emails have come in dribs and drabs. The website has not been updated. There is NO END DATE given.
- 6.29. June 1<sup>st</sup>. JS still awaiting answers to questions posed to Simon Pepper 4 weeks ago, and Liam Walker 2 weeks ago.
- 6.30. May 31. This a further example of goalposts moving while we are ‘being consulted’. How can we give opinions when things keep on changing. GC “We are outside the red line, but we’ve come back from holiday tonight to find a land/property questionnaire (dated yesterday). The form is badly worded, and it also asks for some personal details, for example mortgage reference number. I declined to give them that and asked why they want it.”
- 6.31. May 29 A long awaited email received from Donna Burnell to MSn including the following phrase:
- 6.32. *“On your note about mental health, we recognise people may have concerns about the health effects of living close to an overhead line, and that the uncertainty while the proposals are developed may cause some stress and anxiety.”*
- 6.33. This would seem to indicate a lack of seriousness in considering the actual effects of the project on mental health.

## 7. MAPS

- 7.1. So much new NG information overlaid on the existing maps (PEIR Summary specifically), with some places omitted that often impossible to orientate.
- 7.2. Lack of grid lines/numbers make searching particularly difficult to discuss/find/reference locations
- 7.3. On the ‘whole route’ maps (supplied with the “Community Newsletter”) details are too faint, or not included. Some road numbers omitted, e.g. A414 round Chelmsford. Some of the venue locations are not shown which, as they are remote, is unhelpful, e.g. Chelmsford racecourse, Copdock, Brentwood, Grays etc.
- 7.4. On the PEIR Summary maps, there was so much NG detail it obliterated many of the existing locations, which we needed to get our bearings. Again, had to hunt for and add some road numbers. Main roads colour-faded, so again hard to find.
- 7.5. One affected resident had several meetings at home with NG and representatives, and pylon placings were verbally agreed on maps. They had no written confirmation, and heard nothing more until checking at one of the PIEs, and nothing showed up on the relevant NG maps. They were told not to worry ...
- 7.6. The “Rochdale principle” allows minor changes within an “envelope” to approved plans. However, if you have already agreed changes with them, there is no excuse to not show these for a final, statutory consultation
- 7.7. The interactive maps online are exasperatingly difficult and slow to use. Each layer has to be tracked down within the depths of the labyrinthine non-system, and toggled on separately
- 7.8. Some of the hatched appendages on NG maps went unexplained. When asked, we were told either that they didn’t know (that happened quite often) or that they just might possibly need that track/area to access something sometime.
- 7.9. No explanation of the ‘sticky out’ bits of the red order limit – this means that the public cannot possibly understand what is intended. (People eventually discovered some are for utilities; some are for angle pylons cable tensioning; some are for access post-construction).
- 7.10. A farmer asked about a similar hatched spur across his land, and was told that they might need further access to his farmyard. Couldn’t give more detail.
- 7.11. One resident couldn’t tell what the various lines shown behind his house were. None among the NG staff at the PIE were able to explain.
- 7.12. Map discrepancies: (a) Fordham – Hatchings, not shown on Interactive Map, are construction/works areas. (9b) Low Common and Brick Kiln Lane, Diss IP22 2JU, pylon on Interactive Map shown in different position on paper map. **(APPENDIX VII)**
- 7.13. Pylon route very close to Grade II Listed Balls Farm, Gt Waltham, CM3 1AD. (TB140/TB141?)

- ES [REDACTED] [REDACTED]
- 7.14. Both F [REDACTED] omitted from the map delivered with Community Newsletter 2024 (**APPENDIX VIII**)
- 7.15. May 31. NEW field, number 4, added to land-owner's pack mid-way through consultation. Near Framlingham. Wrong address. (**APPENDIX X**)

## 8. FISHER GERMAN

- 8.1. Apr 21, Mr DW, Lt Waltham: 20 sheets of NG **Fisher German maps, letters and notices attached to a pole with a single cable tie at Little Waltham two miles from where they should have been displayed at several locations near Chatham Green and Great Leighs**. I have complained in strong terms and asked for them to be moved (before they become litter) and so the correct residents can see them. I hope the residents have had this information posted to them individually as well as this attempt at displaying notices. There were many complaints about these across the region [**see sample photos at APPENDIX IV**]
- 8.2. Apr 23, LB: Those Fisher German signs which have suddenly appeared everywhere, probably at huge cost, flapping in the wind and with no weather protection, have just terrified my horse. This could be very dangerous, quite apart from causing litter.
- 8.3. Apr 22, NC: Just looked on map and route is shown as originally planned. [I had recently altered it, with agreement of Fisher German at a meeting few weeks ago putting pylons at edge of fields rather than in the middle]. I had some more maps today about test hole, and the number of pylons and route has changed again.
- 8.4. Mr ND, Bunwell, Norfolk, They have done the exact same thing with us. We had an agreement to move 5 pylons and now I see that this has been totally ignored.
- 8.5. Apr 24, Ms JF, Aldham resident, 1/3 acre garden, had visit from Fisher German who said they needed to cut across the corner of her garden. But they didn't know why, or how much/to what extent...
- 8.6. May 1, Copford: Fisher German were happy to fob me off with misinformation – i.e. the 132 line going underground and appearing on the map where the gas pipeline is – (Somersham)
- 8.7. Apr 30, Ghislingham - Coldham Grove. NG planning to remove trees all the way up this lane to make temporary haul road. And the guys that came to survey had travelled all the way from Merseyside in a diesel guzzling truck. How is that green?
- 8.8. I have a similar problem down furzeway Burgate. NG want to take out the hedgerow, all established hawthorn and blackthorn, as well as 16 to 18 oak trees just for a service road. However, if they moved it sideways by about 5 meters it would be on the edge of the farm field, so no need to fell trees or grub out hedges. Seems to me they don't care for trees or wildlife.

## 9. CRITIQUE OF STATEMENT OF COMMUNITY CONSULTATION (SoCC) – April 2024

- 9.1. This appraisal is not exhaustive, but notes where it has been seen that a procedure has not worked correctly, or to our disadvantage, or where processes could have been carried out differently or better.
- 9.2. 1.4.1 *'We support our communities – and help them to grow (whatever that means?) ... It is our vision to be at the heart of a fair, and affordable energy future'.*
- 9.3. There is nothing fair about the way our East Anglian communities are being treated, having pylons forced upon us, with no alternatives, nearly three years of feedback mostly ignored.
- 9.4. 1.4.8 *'NG has a statutory duty to develop and maintain an efficient, coordinated and economic system of electricity transmission ...'*
- 9.5. If the North Sea wind farms had to coordinate where they brought energy onshore, it would be both far more efficient, and economical than the current pylons/piecemeal non-system. 50% less infrastructure needed, and vast costs saved for the consumer.
- 9.6. 1.4.10. *NG is required under Section 38 of the Electricity Act 1989 to comply with Schedule 9 which ... serves to preserve amenity: 9(1)(a) natural beauty, conserved flora, fauna, protected sites, historic buildings, etc. and 9(1)(b) ... do what it reasonably can to mitigate any effect which proposals would have on the above at 9(1)(a).*
- 9.7. Because of the devastating decline shown starkly in the recent *State of Nature Report (27 Sep 2023)*, it has become impossible to build a project like N to T without desecrating wildlife, countryside and farmland yet further. Mitigation becomes outdated, virtually impossible, and is not necessary if we leave nature alone. It is **impossible**, for example, to mitigate the cutting down of any mature tree, or the grubbing out of a mature hedge.
- 9.8. 2.2.1 *UK Government's Net Zero agenda is driving the need to expand NG's capacity of renewables transmission ...*
- 9.9. This may be correct for the UK as a whole. However the need for extra energy in East Anglia is minimal, and that from the North Sea needs to be transmitted direct to where it is needed: i.e. London and the Southeast. The Hiorns report states that 2035 should be the target.
- 9.10. 2.2.6 The need for new energy for use in E Anglia has not been proved, so there is no need to *'import it into East Anglia'*, it will be more efficient for it to bypass the area and go undersea.
- 9.11. 3.1.5 Most feedback from earlier consultations has been totally ignored. We have never been offered any alternatives, other than pylons, which makes the 'Consultations' deficient. NG has not taken notice of the Essex Suffolk Norfolk Pylons, one of the major stakeholders, nor responded to their closely argued views in response.
- 9.12. 3.1.6 We were certainly not *'consulted at an early stage'*.
- 9.13. 3.1.7. Unfortunately, many homes within 1km did not receive the appropriate documents, so missed out on the necessary information. Conversely, several properties in the PCZ received duplicate details, on April 9 and May 14 (including large, costly Freepost envelopes) the second time by courier Yodel, wasting both time and money, at the consumers' expense.
- 9.14. Libraries (Inspection Points) were often not close enough to the pylons route, with sometimes documents hard to find, sometimes too few, none of the larger volumes, and sometimes no documents at all.
- 9.15. Note: no documents available at libraries at the 'consultations' in either 2022 or 2023.

- 9.16. 5.2.1 There need is for power to be transmitted from the North Sea to the south. It should be integrated offshore.
- 9.17. 5.2.3. This does not '*consult on all aspects*', as it offers only one alternative transmission option. If the Waveney Valley Alternative is being considered for Landscape and Heritage reasons, then as the whole area is subject to Landscape and Heritage issues, the whole project should be reconsidered.
- 9.18. '*There would also be land required for mitigation, compensation and enhancement of the environment, including BNG*'. None of this should be necessary, as there is no need to blight the land in the first place. There are alternatives. If it was not harmed, the environment would not need 'enhancing'.
- 9.19. 5.2.4. The huge, 3 Volume PEIR, at 6,000 pages, is virtually un-navigable considering it is not indexed. One of our Committee has had to spend several days providing an index to it which will now be used by any stakeholder who has need of it. Even staff at your PIEs were unable to find what they wanted in many of your documents.
- 9.20. 5.3.2 *Under Section 47 of the Planning Act, you state you have a 'duty to consult'*. We have found NG to be deficient in this duty for various reasons: in 2022 and 2023 you did not properly consult, as set out in the legal opinions for ESNP.
- 9.21. Table 5.1 Consultation materials. As already touched on, the documents provided are not easy to get at for many reasons: they were not delivered, not in libraries, so large online as to be almost inaccessible. The PEIR Summary is worse than useless, and would have been much better if designed with the entire book containing written information, and maps sent out separately to each relevant area.
- 9.22. Table 5.2 Methods to make consultation documents available. (See Inspection Points.)
- 9.23. 5.6 Public Information Events (2022-2024). As you will see in the PIE section of this report, there were many complaints about these, so we will only summarise here.
- 9.24. They were mostly too far from the villages affected by the route, when most have village halls capable of hosting an event (e.g. Ardleigh
- 9.25. Directions were sometimes wrong (e.g. Chelmsford), and signing from the road either inadequate, small or non-existent
- 9.26. No public transport available, or buses didn't run on the day of the PIE (e.g. Ghislingham)
- 9.27. Inaccessible because of time constraints: only two held on Saturdays, otherwise held on weekdays during the working day (latest closing time was 7pm, which for a commuter area severely limited those able to attend).
- 9.28. All of this meant that the demographic was severely skewed.
- 9.29. 6.1.1 At the PIEs there were large Freepost envelopes provided, but sometimes they ran out (e.g. Chelmsford)
- 9.30. 6.2.2 Our submission on conscientious consideration of consultation responses addressed deficiencies in this respect.

**APPENDIX I**

Email letter from Writtle PC to NG about shortcomings of Chelmsford PIE

**From:** Clerk to Writtle Parish Council

**Sent:** Thursday, May 2, 2024 1:10 PM

**To:** Contact Norwich to Tilbury <[contact@n-t.nationalgrid.com](mailto:contact@n-t.nationalgrid.com)>

**Cc:** Email addressed removed due to GDPR

I am writing on behalf of Writtle Parish Council to complain about the misleading information given for the recent public information event at the Chelmsford racecourse on Saturday, 27 April 2024.

The post code given for the racecourse took you to a side road on the Sat nav and several people turned up at the wrong entrance. There were no signs regarding transport from the car park to the conference room. If you were elderly or had disabilities it was a long walk from the carpark. There was no signage on the main road for the event and very limited public transport options available. The illustrations at the event were misleading as they didn't show all the natural features and made the pylons appear smaller.

The proposed scheme has a massive impact on Writtle, yet there is no event in that area. For one of the non-statutory consultations, you held a public event at Writtle Village Hall. This time around for the statutory consultation there was only one in Chelmsford at the racecourse. As there is very limited public transport that runs from Writtle, this has excluded many residents from the opportunity of discussing the proposals face to face with your project team.

We would urge you to consider holding a public consultation event in Writtle.

Kind regards - Laretta Fox

Clerk to Writtle Parish Council, Parish Office, The Green, Writtle, Chelmsford CM1 3DT

## APPENDIX II

**Sent:** Wednesday, May 1, 2024 4:32 PM

From Mr MS

**To:** '[contact@n-t.nationalgrid.com](mailto:contact@n-t.nationalgrid.com)' <[contact@n-t.nationalgrid.com](mailto:contact@n-t.nationalgrid.com)>

**Subject:** RE: Response to phone call - 18 April 2024

..... I am very disappointed by the response in the email below.

The first point is that it took 11 days to tell me that you would not be sending the documents I requested. This isn't acceptable by any standards, as is being told that I would have to wait "a number of weeks to print and courier" and that "there may be a charge of maximum £500". In the meantime, I could have been sent those documents from the list that you were prepared to send me.

Access to the full PEIR document is a problem. It is a very large and impracticable document to download and view. It is not available at the public library "information points" and the sheer amount of detail means that it is not practical to view and assimilate at the "public information events". The downloaded version is far from ideal for many people.

Best regards



NG Response

**From:** Contact Norwich to Tilbury <[contact@n-t.nationalgrid.com](mailto:contact@n-t.nationalgrid.com)>

**Sent:** Monday, April 29, 2024 3:35 PM

.....  
**Subject:** Response to phone call - 18 April 2024

Dear Mr MS

Thank you for your phone call on 18 April 2024 requesting hard-copy documents. Please see below information that is pertinent to your request:

You requested the following documents:

- 1x ESO report , 1x Feedback report and appendix 1x DDR and appendix
- SOBR and EIR report

Our Preliminary Environmental Impact Report (PEIR), Consultation Feedback Report, Design Development Report and Strategic Options Feedback Report 2024 are large documents, with the PEIR totalling several thousand pages. We would be more than happy to send to you a copy of our PEIR NTS, which is a non-technical summary of our PEIR.\*

You also requested the ESO report. We cannot send the ESO report as this was a study conducted by ESO, but we can send our response to the ESO report. If you would like a copy of the full ESO report, we would direct you to get in touch with ESO at - [box.customerservice@nationalgrideso.com](mailto:box.customerservice@nationalgrideso.com)

Reference copies of the documents you have requested can be found at our events and online at [nationalgrid.com/norwich-to-tilbury](https://nationalgrid.com/norwich-to-tilbury). However, if you would like to proceed with ordering hard-copy versions of documents, please be aware that it may take us a number of weeks to print and courier, and there may be a charge of maximum £500.

If you would prefer, we would be happy to print off specific chapters of documents to send over for no charge.

With best wishes.

Yours sincerely

**Community Relations Team** Norwich to Tilbury      nationalgrid

+44 (0) 800 915 2497

[contact@n-t.nationalgrid.com](mailto:contact@n-t.nationalgrid.com)

***\*Ed Note: This Summary was not particularly helpful. It would have been more useful if individual maps had been requested separately for each area, thus leaving more capacity for useful information within the document. As it is, it is of limited use. (Unnecessarily expensive to post too).***

## APPENDIX III

**From:** Mr M S  
**Sent:** Sunday, May 12, 2024 8:58 PM  
**To:** 'Donna.Burnell@nationalgrid.com'  
**Cc:** 'contact@n-t.nationalgrid.com' <contact@n-t.nationalgrid.com>  
**Subject:** FW: Statutory consultation 2024 documents

Dear Donna

I am writing to inform you that despite the firm promises you made to me at the Lawford PIE on 4 May I did not receive the prints [listed by in your email at Appencix IIA, above]. This meant that the 160 people who attended our village meeting were deprived of vital information. This is simply not right.

Yes, this information should be available at the PIEs, but (a) people aren't aware of it, (b) it is printed on sheets of paper that are too small and (c) it is buried in bound volumes. It is also almost impossible for people to discover this information when they look at the online documentation. The tight timeframe for the request was the result of the limited duration of the consultation set by National Grid and the PIEs starting so early. Having said that 1 week should be plenty of time to fulfil such a request.

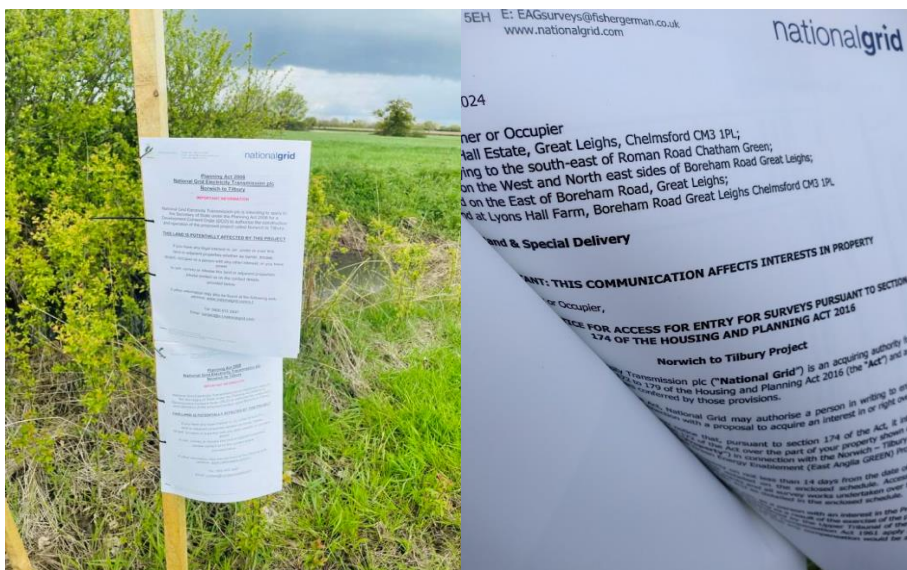
On a different subject, I was watching Countryfile this evening which, ahead of Mental Health Awareness Week, was exploring issues such as how nature can have a positive effect on different aspects of mental health and the current prevalence of mental health problems in farming communities, where the risk of suicide is particularly high. Both issues are very relevant to this ill-conceived Norwich to Tilbury project.

With reference to the former, the destruction of the countryside, the views, the walks etc by the proposed infrastructure hugely reduces the positive effect that nature can have. With reference to the latter, we are witnessing already the impact of the proposal on people's mental health. If, for example, you had stood outside the recent Lawford PIE you would have seen many people leaving in tears. I know a local farmer, whose farm would be decimated by the scheme. His wife of over 30 years has never known him to be in such a poor state of mental health and this is attributed to the scheme. There are many, many more examples. In light of this, please let me know what assessments National Grid has made on the impact of the scheme on mental health and wellbeing, when assessing the many potential harms.

## APPENDIX IV



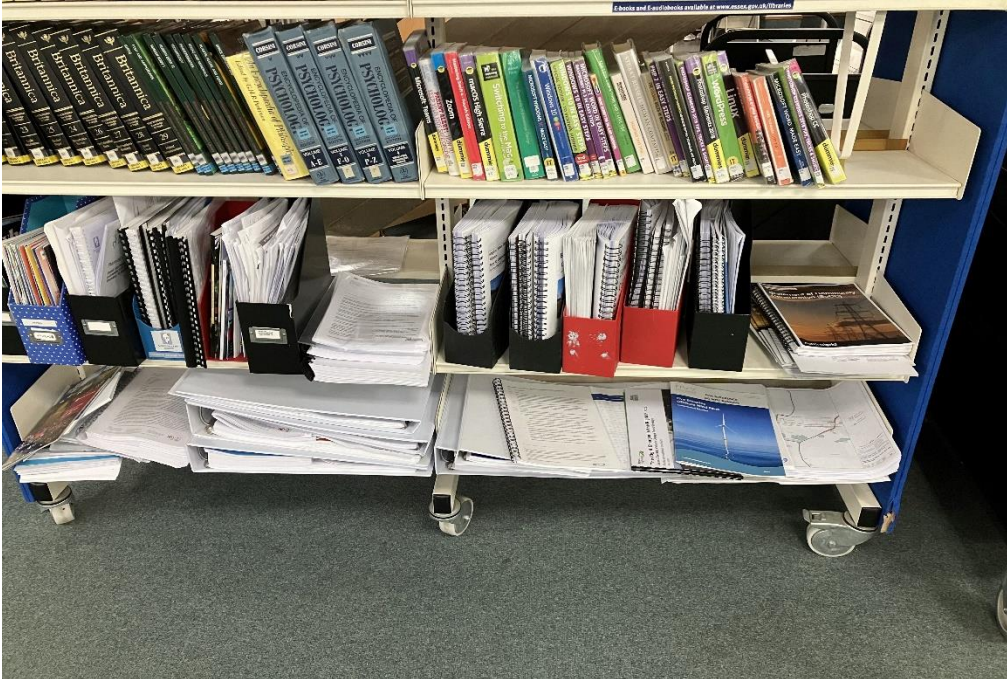
**NG/Fisher German maps littering Aldham roadside**



**NG Fisher German maps littering Mendlesham and Little Waltham roadsides**



## APPENDIX V

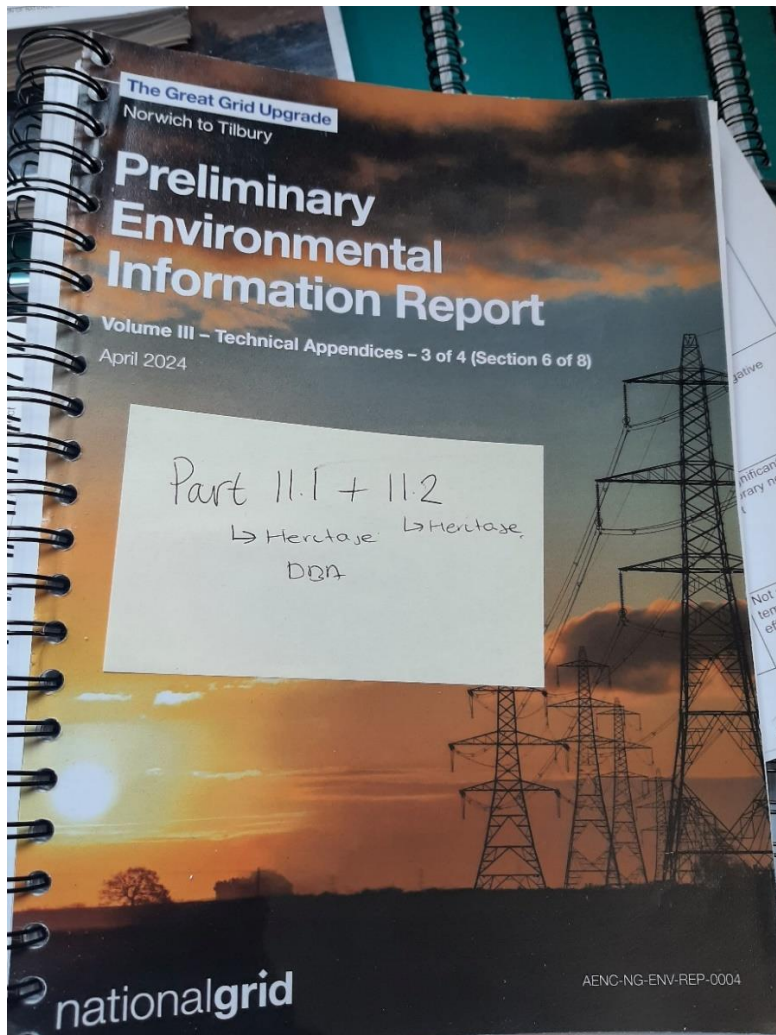


***Colchester Library ‘Inspection Point’ – a pitiful number of NG documents for a large City Library***



***8 May 2024 Grays Civic Hall PIE – 5km from the pylons route. Mid-afternoon, virtually empty. Under 30 people visited during the five-hour window, 2-7pm on a work day***

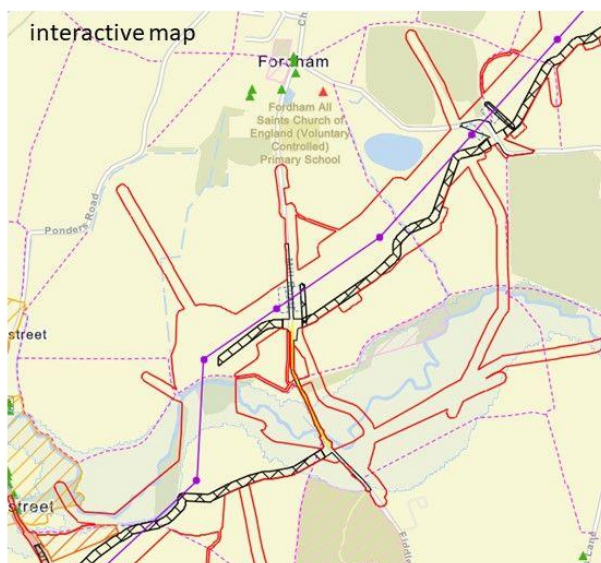
## APPENDIX VI



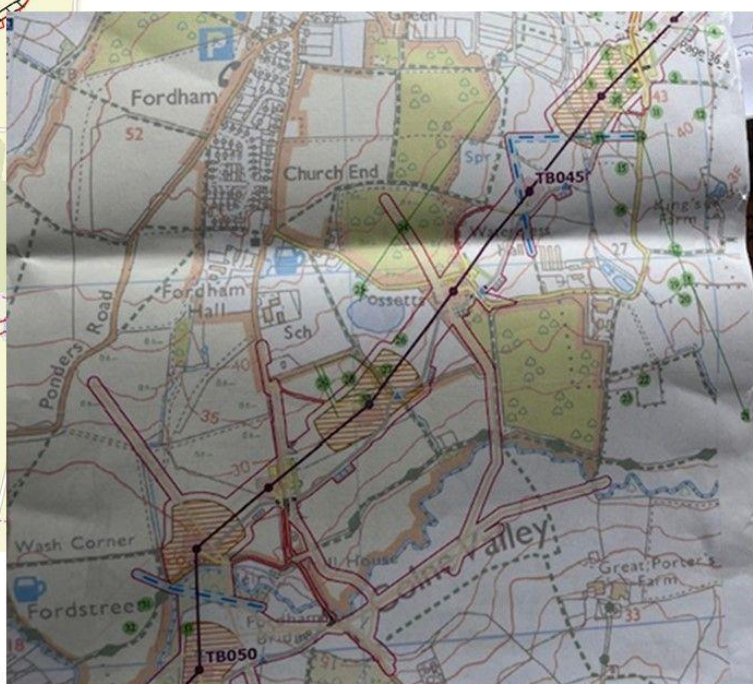


## APPENDIX VII

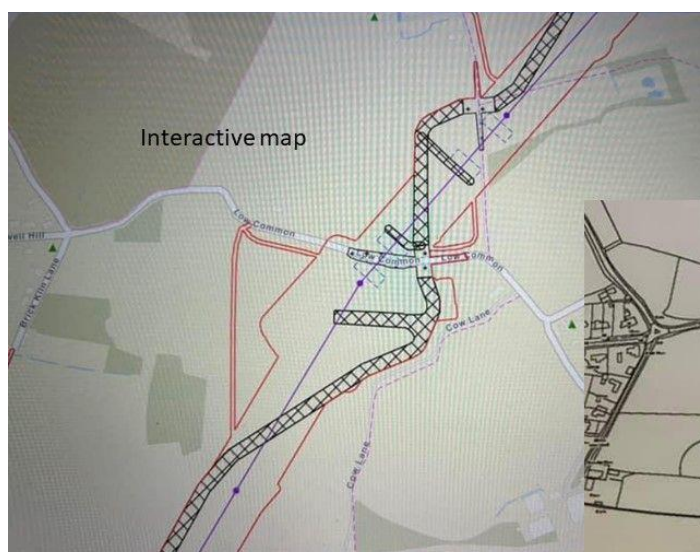
ES



Hatchings, not shown on interactive map, are construction/works areas



### Fordham



Low Common & Brick Kiln Ln  
Diss IP22 2JU

✖ Position of pylon on interactive map



### Diss IP22 2JU

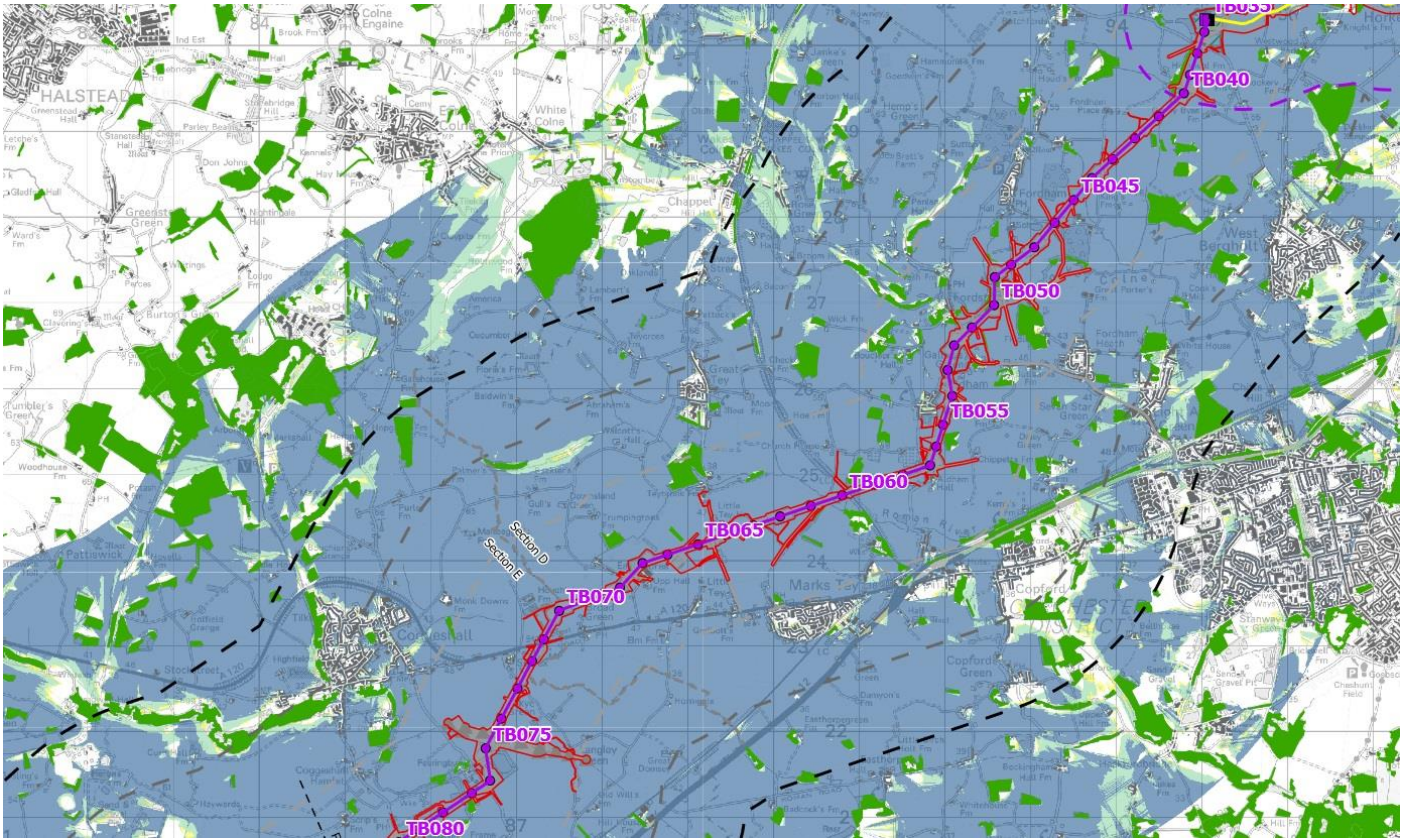
## APPENDIX VIII



***X Marks the 2 spots where both Fordham and Fordham Heath have been omitted from the map delivered with the Community Newsletter 2024***



## APPENDIX IX







## Appendix XI

### NATIONAL GRID 'Advertisement Features'

In the months leading up to the formal consultation there were a series of (paid) Advertisement Features in various BBC magazines: BBC Wildlife (February 2024), Gardeners World, Radio Times, Good Food.com and Countryfile.com. More recently, 11 April there was a similar item in the Guardian newspaper.

Running before and alongside the Statutory Consultation, these all gave a misleading impression of what effect the 'Great Grid Upgrade' would have on the region. There was much talk of sustainable, and green energy; yet nothing of the harm that the transmission will do all over the UK, specifically what damage 112 miles of 510 pylons would do to East Anglia.

There are a few points to mention, first from BBC Wildlife (**below**), but they are relevant to each of the articles. There was much patent 'greenwash':

*"Sustainable energy is to be welcomed"* for instance. However, NG is planning to transmit power over hundreds of miles of 50m pylons (not once mentioned in the article) all over the UK, thus destroying the ever-decreasing countryside.

*"Potential impact to the landscape is possible"* – impact to the landscape is actually **unavoidable**.

Mitigation is almost impossible, especially in the flat lands of East Anglia.

*"Boosting value .. replanting wildflower meadows ... replanting trees"*. How is it boosting value to tear up existing established habitats? It is believed that as many as 6 million hedge plants and 1.6 million trees will be ripped up along the N to T route to make room for pylons and construction.

*"aiming to increase the land's environmental value by 10 percent by 2026"* – how could this be the case when ancient habitats will be ripped up? The land will be seriously devalued.

*"Community grants"*. No amount of community benefits could conceivably make up for the destruction of the land through which this project will bulldoze.

*"Hundreds of thousands of green jobs will created."* –The construction of 510 pylons will industrialise the countryside.

Some of the above applies equally to the Guardian item, but there are some other specific arguments also to be made.

... *"this clean energy ... from where it will be generated to the homes and businesses that need it ..."*. It has not been proved that the power is needed in East Anglia, and there is no reason to wreck the area to get power to London. There are other ways to do it.

"Tom McGarry, deputy external affairs director at NG highlights the **crucial role** of undersea cables, (known as 'interconnectors' ... (to neighbouring countries ...)". Two points to make here. Firstly, only cables between countries are called interconnectors, and secondly NG is making regular use of undersea cables here in the UK. So the 'crucial role' they play should be put into use here in East Anglia. They are used in Scotland, NW England, and a potentially Sea Link through the North Sea – where NG have opted to switch away from pylons. So why couldn't that be done with N to T?

*"Future use of power storage batteries/plants"*. Storage batteries are already available, but rarely used because it appears that if there is no wind or sun, it is easier to use the on-switch of a gas powered station. This cannot continue, it makes a mockery of the sustainable energy generation..

Quoted by the Visual [REDACTED] Advisory Group – a part of NG: “... areas where NG undertakes work will have a better-quality natural habitat than before development started”. How could this possibly be true – they rip up existing established, possibly decades-old, habitats, and start from scratch.

Yet they claim that NG plays a useful part in improving the land, landscape and environment. This is clearly a matter for dispute.

“Even an offshore solution must land somewhere”. Of course it must! But there is more flexibility, and it can be on brownfield sites, not having to wreck prime countryside. The integrated offshore solution would cut the current piecemeal wind farm infrastructure by 50%, thus vastly cutting costs.

A further matter for dispute are the random costings which are regularly quoted by NG, depending on who you speak to. It has been quoted in several reports that offshore transmission can be cheaper than using pylons. We need transparency and to see the various costings.

## **BBC Wildlife Feb 24, NG Paid Advertising Feature**

### **From “What is the Great Grid Upgrade?”**

The switch to clean energy will require a grid capable of transporting all that renewable power from where it’s generated to where it’s needed.

National Grid is working to get this renewable energy to UK homes and businesses and, in doing so, provide everyone with cleaner, more affordable power. At the heart of this plan is The Great Grid Upgrade – the largest overhaul of the electricity grid in generations. The upgrade will involve building new electricity infrastructure and updating old networks to scale up the grid and make it fit for a clean energy future.

Potential impact to the landscape is possible but National Grid works closely with Natural England to reduce the impact of its activities and protect natural habitats as a priority. This includes maintaining its non-operational land (around 1,800 hectares, including ancient woodland and peatland) and aiming to increase the land’s environmental value by 10 percent by 2026.

Boosting value may include replanting of wildflower meadows and native trees or installing beehives and other wildlife homes, depending on the habitat. At a local level, a Community Grant Programme could provide grants to community projects in areas where construction of new infrastructure is taking place.

### **What are the benefits of The Great Grid Upgrade?**

Good for the Planet: Upgrading the grid today will reduce the nation’s carbon footprint and help us to reach net zero faster.

Energy security: British energy supply will become more self-sufficient.

Fairer prices: Home grown power should result in cheaper energy bills.

Economic boost: Hundreds of thousands of green jobs will be created.

## APPENDIX X

Examples of wildly inaccurate NGET Visualisations taken from: <https://www.nationalgrid.com/electricity-transmission/document/154596/download>

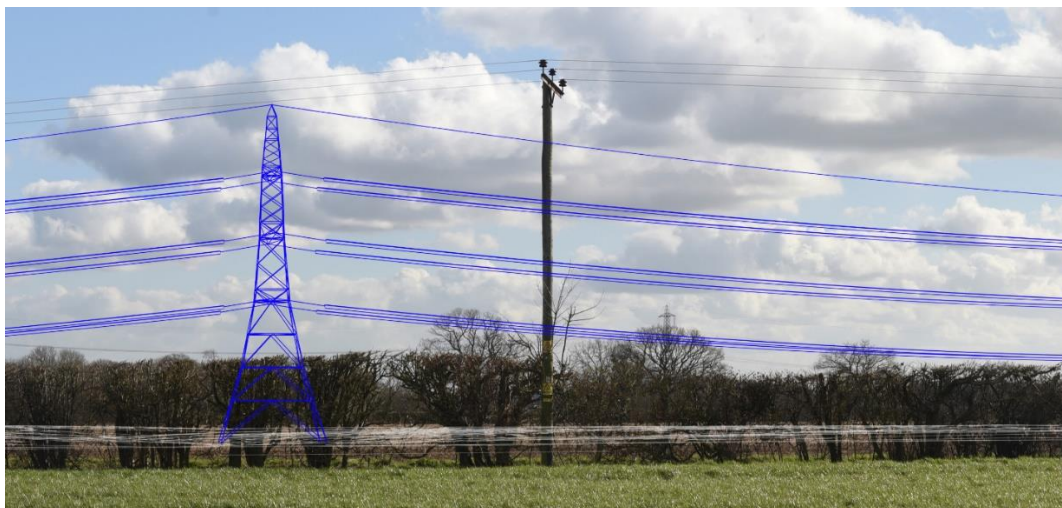
1. Pylons shown half the size of the existing 50m pylons and the same size as a mature oak (which grows to 20m, max 30m)



2. Viewpoint in churchyard from where there is no view! And unexplained white lines.



3. Pylon shown to be the same size as a telegraph pole!





ES

4. Cables shown a



## APPENDIX XI

### Errata

Changes have been introduced to the process very late and those changes are not insignificant as implied by NGET's correction email:

*"Since publishing the Preliminary Environmental Information Report (PEIR) and supporting figures, we've identified some pages where the edges of maps have been clipped. This doesn't affect the information contained within the PEIR or our assessments to date, but it does mean there are some small geographical gaps between map sections in some figures. We've revised the relevant map sheets and have made these available on our Project website alongside an errata document."*

In fact, the PEIR Errata and Corrections Log - June 2024<sup>3</sup> in the document library<sup>3</sup> indicates that the changes don't appear to be as innocent as the email below from NG indicated:

(This is the corrected version of the email after NG had to resend due to errors in the submission dates etc.)

In places the PEIR Errata and Corrections Log is more than just *"edges of maps have been clipped"* as it references additional data. The standard response *"This revision does not affect the preliminary assessment in the PEIR as the figures were not used to undertake the preliminary assessment"* appears to have been cut and pasted throughout.

Even if it does not affect their *"preliminary assessment in the PEIR"* (which is probably very debatable) it could well affect the assessments made by others reviewing the PEIR, such as residents and other bodies. It would not be reasonable to expect stakeholders to read the errata, particularly as it was presented in the email as minor map changes plus a lot of work on submissions was carried out before notification, i.e. between 10 April and 29 June (including work by expensive consultants).

Significantly, it will mess-up referencing in reports where people have referred to specific sheet numbers etc from the original versions and create confusion for PINS.

Examples from the errata document and the associated Revision B and Revision A maps:.

It is very difficult to spot the changes as nothing is provided to highlight them (not helpful). Also, the sheet numbers are different between the revisions and the maps cover slightly different areas.

In the first example the additional scheduled monument could be either the one above Little Horkesley or the one below Nayland. However, as the Revision A maps didn't extend that far it is impossible to know.

In the second example I can't see what the changes are apart from the display range – although this could be important for assessment.

Overall, though without spotting all the changes, the Errata and Corrections Log has 38 entries and from the NG description around half of these appear to me to involve additional data being added to the maps.

PEIR Volume: 2

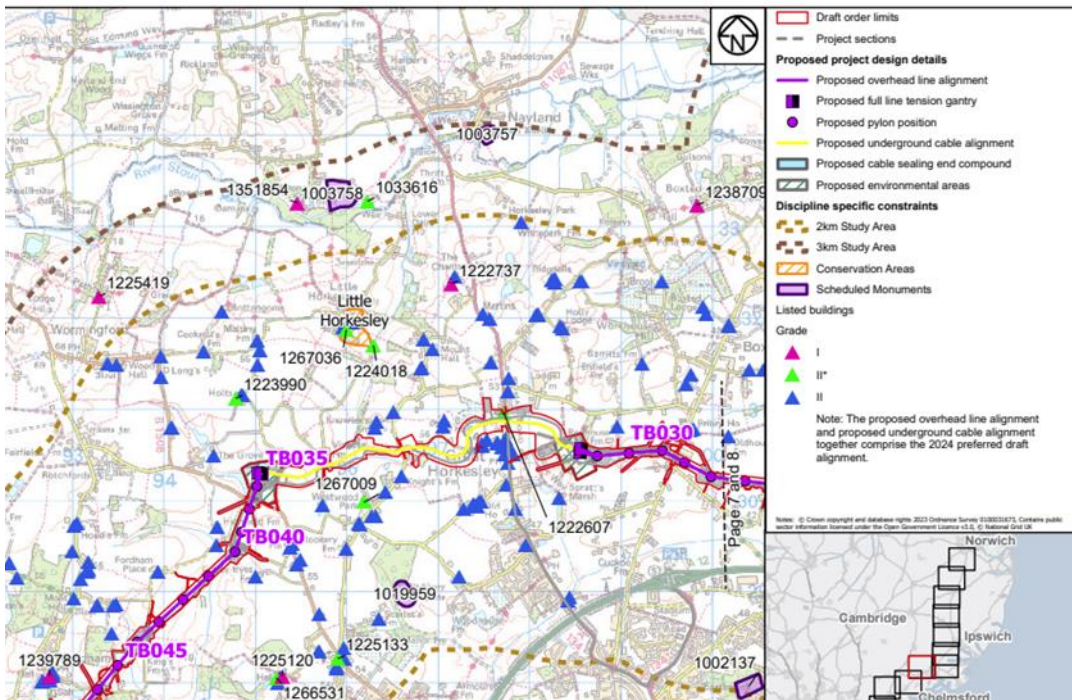
Figure: Figure 11.2 - Historic Environment Designated Heritage Assets and Protected Lanes within Study Area

<sup>3</sup><https://www.nationalgrid.com/electricity-transmission/document/155876/download>

Correction: Additional [REDACTED] ion B to present the full extent of the study area. Page 8 now presents an additional Scheduled Monument and two listed buildings obtained from a third party. This revision does not affect the preliminary assessment in the PEIR as the figures were not used to undertake the preliminary assessment.

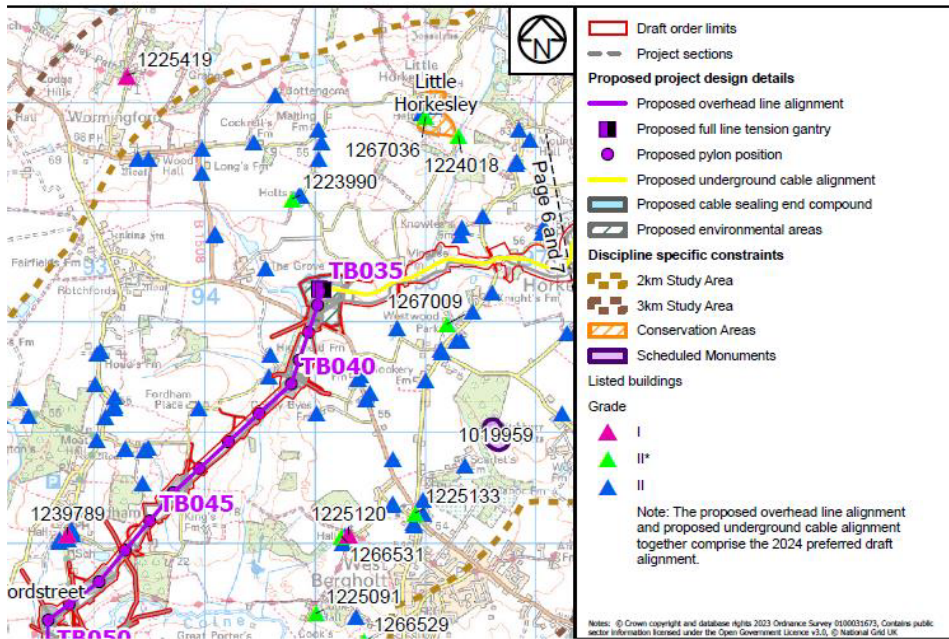
## Revision B

Figure 11.2 - Historic Environment - Designated Heritage Assets Within Study Area Page 8 of 13



## Revision A

Figure 11.2 - Historic Environment - Designated Heritage Assets Within Study Area Page 7 of 11



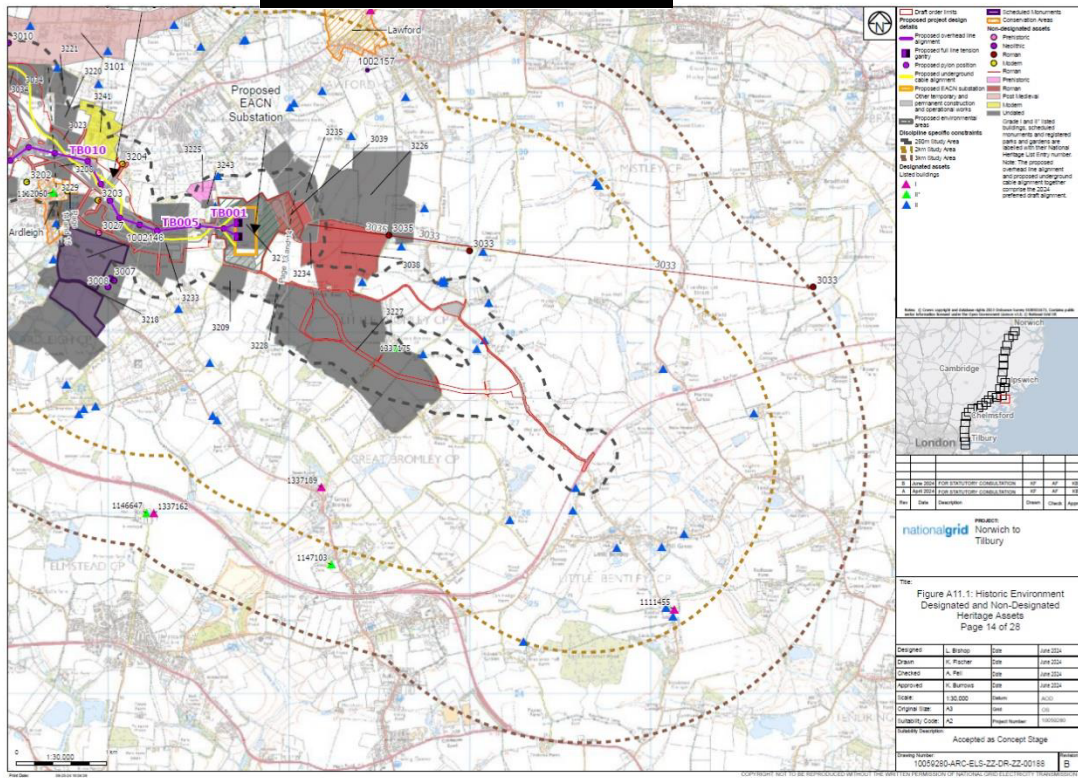
PEIR Volume: 3

Figure: Figure A11.1 – Historic Environment - Designated and Non-Designated Heritage Assets within Appendix - 11.1 - Historic Environment Desk-Based Assessment

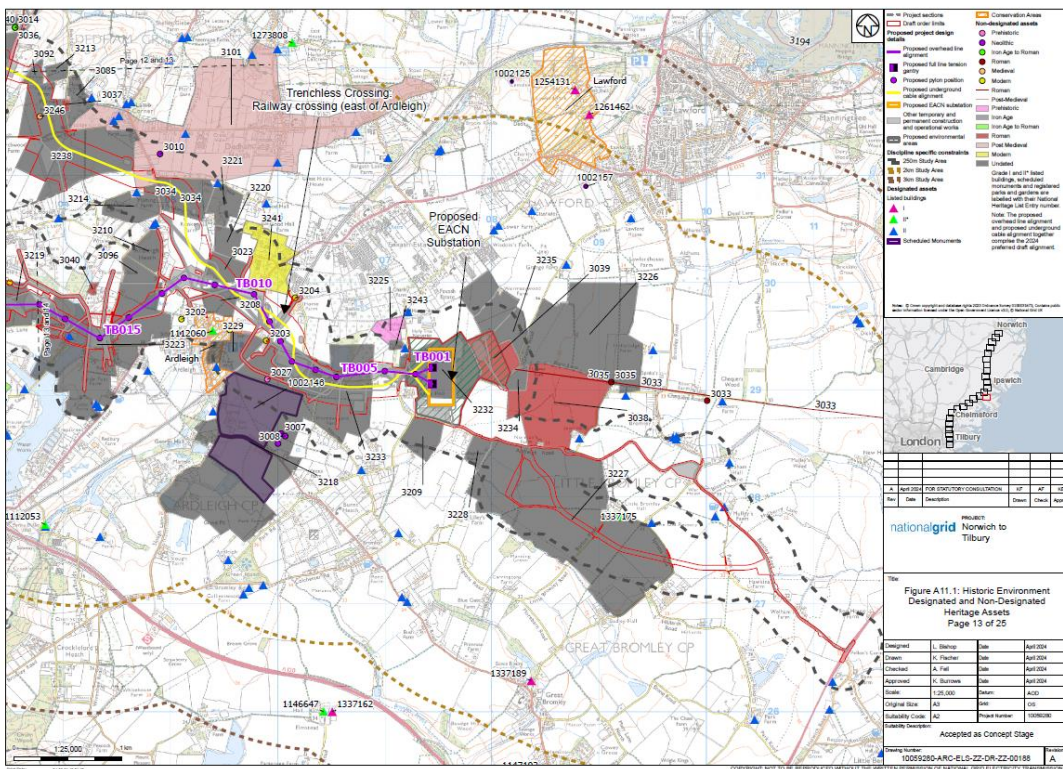
Correction: Revision B has been re-scaled and an additional page included to present the full extent of the study area. Pages 1, 2, 3, 5, 8, 9, 10, 12, 14, 16, 17, 18, 19, 20, 21, 23, 25 and 26 now present additional non-designated assets, parts of Conservation Areas, Listed Buildings and Scheduled Monuments obtained from third parties. This revision does not affect the preliminary assessment in the PEIR as the figures were not used to undertake the preliminary assessment.

**Revision B**





## Revision A



# Lack of consideration given to ESNP consultation responses

## 1. Introduction

- 1.1. Under consultation law, a consultation may only be considered legitimate if the four rules of The Gunning Principles are met.
- 1.2. **Gunning Principle number 4 requires that ‘conscientious consideration’ be given to the consultation responses before a decision is made, and that decision-makers should be able to provide evidence that they took those responses into account.**
- 1.3. National Grid Electricity Transmission (NGET) also reminds us in its documentation<sup>1</sup> of its obligations under the Planning Act 2008 and National Policy Statements (NPS):
  - 1.3.1. *“NGET is committed to taking into account community feedback on its proposals. In line with processes and guidance from the Planning Act 2008 and National Policy Statements, stakeholders and the public are consulted during the proposed project’s evolution allowing for feedback to have influence in the development of the location, design and mitigation proposals of our schemes.”*
- 1.4. However, as we demonstrate below, NGET has ignored, or glossed over, a large number of the submissions from Essex Suffolk Norfolk Pylons action group (ESNP) and stakeholders. Therefore its three consultations to date are invalid.

## 2. Why ESNP is a key stakeholder.

- 2.1. ESNP represents 34,000 people along the entire length of the proposed route. Our committee includes members from the length of the route, and committee members run sub-groups along the route. Therefore, with our geographical reach, and our local knowledge of the Norwich to Tilbury pylons route, we were able to send a significant amount of evidence and supporting information to NGET in both of the non-statutory consultations. In 2022 we sent an 80-page submission accompanied by a survey completed by 2,500 people. In 2023 we sent 14 documents and a survey filled in by over 1,100 people, as listed below:
  - Covering letter
  - Charles Banner KC legal opinions: second non-statutory consultation; Treasury Green Book
  - Backcheck; Design Development Report; Need
  - Bird hotspots; Priority habitats; Bird strikes
  - Landscapes; Heritage and culture
  - Feedback
  - Consultation strategy
  - Alternatives: integrated offshore grid
  - ESNP survey
- 2.2. Our supporters expect us to respond on their behalf and rely on us to do so. Many of them cite our submissions to cover their high-level arguments so that they can concentrate on their local submissions. We even know that some of the region’s property consultancies advise land owners to endorse our project-level submission, before focusing on the local-level.
- 2.3. We are therefore a significant stakeholder in the process. As such a key stakeholder, and because of Gunning Principles, our submissions merit an in-depth response. We set out below the areas where NGET has failed in its duty to give conscientious consideration to our submissions.

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<sup>11</sup> <https://www.nationalgrid.com/electricity-transmission/document/154786/download>

### 3. 2023

- 3.1. Instead of addressing the issues raised by ESNP, NGET says<sup>2</sup> that in its analysis of the 2022 submissions, it 'boiled down' responses into generic categories:
- 3.2. *"4.10.126 Criticism that only selected parts of the previous Essex Suffolk Norfolk Pylons (ESNP) action group 80-page submission and survey filled in by 2,500 people were considered (many issues raised were not considered at all and others have been given inadequate consideration). National Grid followed due process to report on all feedback received during the 2022 non-statutory consultation and to explain how the consultation results have been taken into account. This included responses to the feedback form, emails, and letters. All feedback was read and analyzed using a coding framework. This framework enabled the grouping of responses into location, categories, and themes. Each code was responded to within the report within a table specific to the location it was referring to. If no location was specified, or if responses were general to the Project, a separate table ('non-section specific') was used. This was considered a reasonable and proportionate approach given the volume of feedback received and preferable to setting out each individual item of feedback in the report which would lead to duplication."*
- 3.3. We do not agree that it is a reasonable approach to distill in-depth and considered evidence in this way.
- 3.4. There is no evidence that much of what we submitted in 2022, including the survey filled in by 2,500 people, was given consideration.

### 4. 2024

- 4.1. NGET has once again not given our submissions proper or conscientious consideration. In fact, one wonders if they have read many of our numerous and detailed submissions at all.
- 4.2. It is nigh on impossible to establish where NGET has considered our submissions.
- 4.3. Firstly, the NGET documentation<sup>3</sup> points us to Chapter 3 of the 2023 Non-Statutory Consultation Feedback Report, to explain how our submissions have been considered.
- 4.4. However, upon examination, Chapter 3 does not contain any consideration of our submissions.
- 4.5. We asked about this at two of the Public Information Events.
- 4.6. At the first event, the NGET staff member did not know the answer. At the second one, the NGET staff member explained that, in some impossibly mind-bending and circular logic, the reference to 'Chapter 3' meant the considerations are hidden in the very chapter that the reference to Chapter 3 is contained in.
- 4.7. Subsequently we received an email from NGET. It noted that the reference to Chapter 3 was incorrect. It advised that consideration to our responses had been given in Chapter 4. However, in that email, NGET points out that only the following six discreet elements of our submissions have been given consideration (and each of these only in a perfunctory manner):
  - 4.7.1. Paragraph 4.10.88 - Criticism that alternatives were not presented for consideration in the first non-statutory consultation or in the second consultation

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<sup>2</sup> <https://www.nationalgrid.com/electricity-transmission/document/154261/download>

<sup>3</sup> <https://www.nationalgrid.com/electricity-transmission/document/154261/download> 4.2.79 Criticism that National Grid did not address the Legal opinion by Charles Banner KC that found that the consultation was deficient. *The feedback provided by Essex Suffolk Norfolk Pylons group, which included a legal opinion from Charles Banner, has been considered and our responses can be found in Chapter 3 of this report.*



- 4.7.2.Paragraph 4.10.115 - Criticism that National Grid have not complied with the Electricity Act 1989 (i.e. paragraph 1(1) of Schedule 9, conserving fauna, and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest)
- 4.7.3.Paragraph 4.10.89 - Criticism that backchecking has not included offshore options
- 4.7.4.Paragraph 4.10.79 - Criticism of previous 2022 non-statutory consultation (including criticism that National Grid has not considered feedback from previous consultation)
- 4.7.5.Paragraph 4.10.99 - Criticism that Gunning Principles have not been considered
- 4.7.6.Paragraph 4.10.203 - Suggest that the Project should follow the HM Treasury Green Book (e.g. legal requirements and methodology) / Criticism that HM Treasury Green Book has not been followed

**4.8. It is therefore evident that NGET has pressed ahead with its previously preferred option, in contravention of Gunning Principle number 1 which requires a consultation to be held before a decision has been made and Gunning Principle 4 which requires conscientious consideration of consultation responses.**

**4.9.** In order to double-check whether it is really the case that our in-depth submissions have been ignored, we picked through NGET's individual 'coded' responses using 'word search' (as also advised by an NGET staff member). We set this analysis out below.

**4.10. Offshore grid and need.**

- 4.10.1.1. NG ignores the ESNP submission that the need boundary is a North Sea one, and that Norwich should not be the starting point. As we pointed out in our 2023 submission, it is clear from the 'backcheck' that the issue is how to move power south, towards London, out of the area north of the EC5N boundary, from the Sizewell generation group, and from the Essex generation group.
- 4.10.1.2. NGET's public presentation of the problem as a need to transfer power from Norwich to Tilbury is therefore incorrect, and it continues to refuse to address this.
- 4.10.1.3. Furthermore, NGET has not addressed our point that although the principle of N2T was set out in electricity planning decisions such as the Network Options Assessment, this does not trump planning law.

**4.11. Quantitative analysis**

- 4.11.1.1. No consideration of this found. We stated that quantitative analysis of socio-economic and natural capital impacts must be provided. NGET states that impacts on leisure and tourism will be 'written up' in the Environmental Impact Assessment (EIA) but does not respond to requests for quantification of impacts.

**4.12. House prices**

- 4.12.1.1. No consideration of this found. We stated that the impact of the project and alternatives on house prices must be provided.

**4.13. Bird report submissions**

- 4.13.1.1. None of our three reports addressing bird strikes, priority habitats and bird hotspots have been addressed.

**4.14. ESNP landscapes report**

- 4.14.1.1. No consideration of this found.

**4.15. 'A Patchwork of East Anglian Heritage and Culture'**

- 4.15.1.1. No consideration of this found.

**4.16. Heritage – Forge Field case and Bramshill case**

- 4.16.1.1. No consideration of this found.

**4.17. Hiorns report**

- 4.17.1.1. No consideration of this found.

**4.18. Consultation issues**

- [REDACTED] S [REDACTED]
- 4.18.1.1. We raised a great many issues with the 2023 consultation, for example that drop-in events were in poor locations and during the working day. This has been ignored. Locations remained poor, e.g. Grays Public Information Event was 5km from the route; there is, once again, no event in the most impacted village, Ardleigh; and Witham is an in-town venue without parking and off the pylons routes. There were only two Saturday sessions and no evenings 2024.

**4.19. ESNP survey**

- 4.19.1.1. No consideration of this found.

**4.20. ESNP viewpoints map**

- 4.20.1.1. No consideration of this found.

**4.21. Bradwell**

- 4.21.1.1. Once again, NGET seemingly deliberately misses the point of our requests in 2022 and 2023 to look seriously at Bradwell as a landing point for North Sea power. By willfully misunderstanding alternatives, NGET is able to continue post-justifying its preferred option of transmission lines from Norwich to Tilbury, instead of looking at boundary needs from the North Sea, as set out above. Conscientious consideration would mean addressing the issues raised, not answering a different question as here -
- 4.21.1.2. *"In respect of connecting at the old Bradwell power station, there is an existing overhead line connection to the Bradwell B site. This has been operating at lower voltage (132 kV) and has not been used for a few years and is in generally poor condition. This overhead line would need to be rebuilt however this onward connection via Rayleigh to*
- 4.21.1.3. *Tilbury is also constrained by urban development and further designations and some sections may need to be re-routed if connections were made at Bradwell. Additionally, any connection point also requires two points of connection to the National Electricity Transmission System (NETS) (to meet compliance standards) requiring either a double overhead line through the Bradwell Peninsula and onwards to separate locations or a connection back to Bramford (in addition to one towards Tilbury). A connection to Bramford would require connections to cross the Special Protection Area (SPA) designated Blackwater Estuary (3 km to 7 km tunnel likely to be required at much greater cost) as well as interact with other Special Area of Conservation (SAC) and SPA designations.*
- 4.21.1.4. *The existing network through Norfolk, Suffolk and Essex would also still need to be upgraded to transport the electricity due to come onto the network in the Norwich area and provide the necessary two points of connection to the NETS. Taken together a Bradwell point of connection requires a greater amount of new infrastructure and is therefore less economic and efficient and expected to be associated with greater environmental effects and Friston does not meet the reinforcement requirement."*
- 4.21.1.5. It is a nonsense to argue that a greater amount of new infrastructure is needed if the landing point chosen is Bradwell and the existing route to south Essex is used. Further, taking into consideration the revelation in the NG ESO Eastern Review 2024, HVDC cabling could remove the need for ANY pylons in that area, thus improving the landscape.

**5. Specific note on lack of consideration of Archaeology**

- 5.1. Archaeology merits a specific mention due to the blatant lack of consideration of consultation responses.

- [REDACTED] S [REDACTED]
- 5.2. Despite NGET representatives emphasising the importance of community submissions in the media (e.g Liam Walker, 16 May, BBC Radio Norfolk), it is blatantly obvious that submissions are ignored.
  - 5.3. With regards to archaeology, there are several situations in Essex in which a pylon or works compound has been placed on top of an archaeological site referred to National Grid at least twice by residents. See map, Appendix.
  - 5.4. The first, involves sites in Fordham, and was advised to NGET by Mike Hamilton-Macy (Chairman of Colchester Archaeological Group, Fordham parish councillor and active member of Fordham Local History Society) as follows:
    - 5.4.1. Fordham parish council official response. 2022 and 2023.
    - 5.4.2. Completed the heritage form on NGET's site. 2024.
    - 5.4.3. Sent in another on behalf of one of our farmers, whose land some of the archaeological sites are on. 2024.
    - 5.4.4. Phoned NGET directly, advising them that they should get in contact regarding archaeological sites. 2024.
    - 5.4.5. Telling NGET of below ground heritage at the first "consultation" in 2022.
  - 5.5. Despite being informed of archaeological sites, NGET has done the following:
    - 5.5.1. Located a pylon directly on top of confirmed Roman archaeology in a field directly adjacent to an exceptional and active Roman dig with Stone Bronze and Iron Age finds, a bathhouse and Roman and Saxon burials. This includes one of only two 'piscina' (indoor fountain/water feature) known in the country.
    - 5.5.2. Located the draft order limit across the site of that Roman dig and covering cropmarks which show two rows of post holes (Saxon?) and possible archaeology extending from the dig site.
    - 5.5.3. Located all of the following archaeological sites within the draft order limit: Roman Road; Prehistoric site (extensive flint working); confirmed Roman site; Cropmarks suggesting building, period unknown; Likely Roman building; cropmarks suggesting enclosure and building in field called House Field.
    - 5.5.4. The second example involves a suspected Roman Villa, at Little Horkesley. Residents notified NGET of this in 2022 and 2023. Geophysics indicates very clearly that a slate kiln is likely, in the very location chosen for a sealing end compound.
    - 5.5.5. The NGET archaeology 'expert' at the Langham public information event on 16 May 24 had no knowledge of any community submissions (nor specifically of the above) about archaeology. When she described the process undertaken by NGET, she made it clear that community submissions are never part of the process and that NGET is not interested. This not only means that archaeological sites are at risk. It also demonstrates a severe breach of Gunning principle no 4.

## 6. Conclusion

- 6.1. As stated in our introduction to this document, in the light of Gunning Principle number four, *"'conscientious consideration' must be given to the consultation responses before a decision is made. Decision-makers should be able to provide evidence that they took consultation responses into account."*
- 6.2. It is clearly evident that NGET is unable to demonstrate that it took our consultation submissions into account before deciding to continue with the overhead lines proposal between Norwich and Tilbury.
- 6.3. Consequently, **this third, Statutory consultation is therefore deficient.**

## Appendix

