



# Norfolk County Council

## Written summary of oral submissions made at the preliminary meeting and ISH1

Norwich to Tilbury

(EN020027)

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Deadline 1 – 26 February 2026

1. This submission provides Norfolk County Council's written summary of oral submissions made at the preliminary meeting (held on 10 February 2026) and ISH1 (held on 13 February 2026). The speaking notes for Cllr Graham Plant's submission to OFH3 (held on 12 February 2026 in Norwich) are provided as a separate submission.
2. NCC raised procedural issues in writing in our response to the rule 6 letter [PDA-006], which was submitted at procedural deadline A. Our written summary of oral submissions made at the preliminary meeting should therefore be read alongside our response to the rule 6 letter.

**Table 1: Norfolk County Council's written summary of oral submissions made at the preliminary meeting**

<i>Agenda Item</i>	<i>NCC comment</i>	<i>Exam. refs.</i>
Item 1	<p><u>Welcome and introductions</u> Counsel acting for Norfolk County Council, Ruchi Parekh, led introductions for NCC. Isaac Nunn, NCC's NSIP Team Leader also attended. Both Ms Parekh and Mr Nunn attended virtually via Microsoft Teams.</p>	
Item 2	<p><u>Examining Authority's remarks about the examination process</u> NCC made no submissions in relation to agenda item 2.</p>	
Item 3	<p><u>Initial assessment of principal issues</u> NCC made no submissions in relation to agenda item 3.</p>	
Item 4	<p><u>Draft examination timetable</u> A number of interested parties made submissions about deadlines 3 and 5 asking for the dates of each to be move from the Tuesday to the Friday in each case. NCC noted that if any further deadlines were to be moved to accommodate the applicant's requests, then any subsequent deadlines should also be amended to allow the host authorities sufficient time to respond.</p> <p>NCC would appreciate any early indication for dates and topics of ISHs in the reserved hearing weeks.</p>	
Item 5	<p><u>Procedural decisions taken by the Examining Authority</u> NCC made no submission in relation to agenda item 5.</p>	
Item 6	<p><u>Format of future hearings and accompanied site inspection</u> NCC made no submissions in relation to agenda item 6.</p>	
Item 7	<p><u>Any remaining questions or submissions regarding procedural matters not set out in the agenda that have been submitted in writing by procedural deadline A</u> NCC made no submissions in relation to agenda item 7.</p>	
Item 8	<p><u>Any other matters</u> The applicant offered to make available a GIS system at future issue specific hearings which would be used to help orientate participants and access information quickly. NCC expressed support for the use of technology as an aid to the efficiency of hearings.</p> <p>In response to a point in NCC's response to the rule 6 letter, the ExA explained the role of additional planning inspectors who support the ExA. It was clarified that they shadow the ExA so</p>	[PDA-006]

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<i>Agenda Item</i>	<i>NCC comment</i>	<i>Exam. refs.</i>
	<p>that in the event of a change to the membership of the panel the lead member can more easily comply with their duty under §73 to ensure new members have the necessary knowledge of proceeding to date. NCC thanked the ExA for the explanation.</p>	

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**Table 2: Norfolk County Council's written summary of oral submissions made at ISH1**

<i>Agenda Item</i>	<i>NCC comment</i>	<i>Exam. refs.</i>
Item 1	<u>Welcome, Examining Authority (ExA) introductions and arrangements for the hearing</u> NCC made no submissions in relation to agenda item 1.	
Item 2	<u>Purpose of this issue specific hearing and ExA opening remarks</u> NCC made no submissions in relation to agenda item 2.	
Item 3	<u>Introduction of participants</u> Counsel acting for Norfolk County Council, Ruchi Parekh, led introductions for NCC. Isaac Nunn, NCC's NSIP Team Leader also attended. Both Ms Parekh and Mr Nunn attended virtually via Microsoft Teams.	
Item 4	<p><u>Scope of the proposed development</u></p> <p>4.1 The applicant provided an overview of the location of the pylon transmission route, siting of new substations at Ardleigh and Tilbury North, cable sealing ends and the main construction compounds. NCC made no submissions on this point.</p> <p>4.2 The applicant provided an overview of their approach to limits of deviation. NCC notes that the limits of deviation are generally 100m wide (50m either side of the centreline), unless where limited further by a commitment in the outline code of construction practice (see commitment reference GG34 in oCOCP). According to para 4.5.3 of the project description, pylons can be located anywhere within the LoD. NCC ask for clarity on whether allowance must be made for the vegetation clearance swathe (56m total width, or 28m either side of the conductor). Does this mean in practice that pylons can only be placed within 22m of the centreline, otherwise the vegetation clearance and management swathes would trespass outside the order limits?</p> <p>NCC notes that the Arboricultural Impact Assessment is premised on a specific alignment of the conductor along the centreline. Longitudinal movement of pylons could result in greater effects by resulting in greater loss of woodland or, in particular, loss of veteran trees. See e.g. page 28 of arb. impacts plan in AIA.</p> <p>NCC considers that the LoD should account for the vegetation clearance swathe to avoid potential further adverse impacts. NCC would also like clarity as to whether there are any controls on the</p>	<p>[APP-130]</p> <p>[APP-300]</p> <p>[APP-236]</p>

<i>Agenda Item</i>	<i>NCC comment</i>	<i>Exam. refs.</i>
	<p>movements of pylons within the LoD (other than those at those locations specified in the oCoCP).</p> <p>4.3 The applicant explained its proposals for existing pylons and overhead transmission lines, including reconfiguration, modification and removal of parts of the existing transmission and distribution lines. NCC made no submissions on this point.</p> <p>4.4 The applicant set out its choice of underground cabling and proposed methods of installation.</p> <p>While there is no underground cabling proposed in section A of the route (i.e. Norfolk), the ruling out of tunnelling in the Waveney Valley makes this salient for NCC. EN-5 imposes a requirement under paragraph 2.9.14 for the applicant to 'demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line'. On this basis, NCC would ask that the applicant provide more financial detail to justify the statement at paragraph 4.6.16 of the Design Development Report that tunnelling (as opposed to horizontal directionless drilling or driven pipe methods) 'would be possible but at a level of cost not considered to be compatible with National Grid's duties to be economical'.</p>	
Item 5	<p><u>Alternatives</u></p> <p>5.1 The applicant provided an overview of its approach to alternative methods of electricity transmission and reasons for discounting them. Since the first non-statutory consultation, NCC has urged National Grid to consider an offshore solution, and underground option, and alternative strategic measures such as upgrades and improvements to existing lines. NCC maintains that more could have been done with the time since 2022 to develop and compare alternative approaches. NCC does understand the policy position regarding strategic alternatives and accepts that this examination must deal with the present application.</p> <p>5.2 The applicant provided a summary of its reasoning for overhead rather than underground lines, choice of pylon size and design, and different types of transmission including offshore connections including costings. EN-5 imposes a requirement under paragraph 2.9.14 for the applicant to 'demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line'. In addition to the point about tunnelling above, NCC would ask generally that the applicant</p>	

<i>Agenda Item</i>	<i>NCC comment</i>	<i>Exam. refs.</i>
	provide estimated costings to justify the rejection of any site-specific mitigative design approach due to cost. NCC has made site-specific submissions in our LIR and at any appropriate ISH.	
Item 6	<u>Interrelationship with other projects</u> NCC made no submissions in relation to agenda item 6.	
Item 7	<u>Any other matters</u> NCC made no submissions in relation to agenda item 7.	
Item 8	<u>Review of actions arising and close</u> (reserve for any remarks about actions)	



**Norfolk** County Council

# Open Floor Hearing 3: Note of oral submission

Norwich to Tilbury

(EN020027)

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Deadline 1 – 26 February 2026

Open Floor Hearing 3

The Space, Norwich

12 February 2026

**Speaking notes for Cllr Graham Plant's remarks (as delivered)**

1. Good morning. I'm Graham Plant. I'm a councillor and cabinet member at Norfolk County Council. My portfolio is highways, infrastructure and transport so I have responsibility for the County Council's response to Nationally Significant Infrastructure Projects like this one.
2. As the County Council we have a number of responsibilities that are affected by this project one way or another. We are, amongst other things:
  - a local highway authority,
  - a lead local flood authority,
  - a fire and rescue authority,
  - a public health authority, and
  - a planning authority.

So, we come to this examination with an interest in a number of statutory duties. It is very important that whatever we think about this project overall (and I'll come on to that), we do everything we can to minimise any impacts on our ability to carry out these functions and protect the environment and communities that we are entrusted with.

3. I have asked NCC officers and our legal representative to attend Issue Specific Hearings and make written submissions to set out our case on all the technical and environmental issues that this project brings up. I'm sure, in particular, that you're looking forward to reading our Local Impact Report, which we will submit at Deadline 1.
4. Of course, as well as all these technical and statutory roles, we are also a democratic organisation, which has a duty to represent the interests of our communities more generally. As an elected representative of the county council's administration, I have a part to play in laying out our views in a way

that goes beyond Environmental Impact Assessment or the finer points of DCO drafting.

5. So, our position throughout the consultation process for this project has been very consistent. At the first non-statutory consultation in 2022 we asked National Grid to reconsider the strategic approach by investigating an offshore or underground option. We, alongside Essex County Council and Suffolk County Council commissioned a review of the strategic options which showed that there was time for a rethink. National Grid have pushed through with an overhead proposal and the time to rethink those strategic options has come and gone.
6. And I must say that in Norfolk we also have 18 NSIPs on the go at the moment (with solar farms) and the cumulative effect of that on Norfolk is immense. Each NSIP is being sought on its own merits and demerits and, as the cumulative effect on Norfolk is so great, I hope it is being looked by the inspectorate as one rather than each as an individual project.
7. In an ideal world we would want to avoid landscape impacts for the whole of Norfolk, but we have particularly focused on the Waveney Valley. This is primarily because it is the most sensitive landscape in the project's route through Norfolk. With Suffolk County Council, we jointly commissioned a Valued Landscape Assessment which shows the sensitivity of the landscape. But we also focused on this area because a new run of pylons through the Waveney Valley would complete the encirclement of Diss by electricity transmission infrastructure. An existing 400Kv line runs from north to south, wrapping round the east of Diss. There is a 132Kv line running south from a UK Power Networks site in Diss. Norwich to Tilbury runs from north to south, like the existing transmission line, but rather than running parallel to the existing route, it wraps around Diss to the west. From the point of view of Diss, the relationship between the town and the open countryside would be completely framed on all sides by pylons. The cumulative impact is enormous.
8. We thought National Grid understood the impact it is having on Diss when the statutory consultation in 2024 included an underground Waveney Valley Alternative which would have put the cables underground for a 2km stretch of the route. This proposal isn't something that National Grid would have done lightly. We all know that underground cables are more expensive than pylons.

We all know that overhead lines are, to quote the national policy statement, “the strong starting presumption for electricity networks in general”. So the fact that this option was ever on the table means that National Grid know the damage their pylons are doing to the Waveney Valley and to Diss.

9. We were therefore so disappointed to find out in the targeted consultation last year that the Waveney Valley Alternative was no longer part of the proposal. In the application materials, the applicant admits that there will be significant adverse impacts to the landscape all through Norfolk, but most of all in the Waveney Valley.
10. So, in conclusion there are, we are told, practical and environmental barriers that prevent the applicant from undergrounding. We can argue about that, but no undergrounding leaves us with huge impacts on our residents and our landscapes. Norfolk officers will do what they can to negotiate and argue to improve the proposals as they stand. We don't think this project is the best strategy for our transmission grid, but now we are here with the application in front of us the applicant cannot be let off the hook for mitigating the damage they will cause.

Thank you.