Submission ID: [redacted]

Formal Representation to the Planning Inspectorate
Application Reference: EN020027 (Norwich to Tilbury)
Subject: deficiencies in procedural fairness, data accuracy and evidentiary integrity
Introduction
I am writing to provide an additional submission regarding the Norwich to Tilbury network reinforcement project.
Throughout the successive stages of this process, it is my view that the Applicant has often failed to provide accurate, fully transparent, and well-evidenced information regarding both asset valuations and the comprehensive cost comparisons between the proposed overhead scheme and its viable alternatives.
Of significant concern is that communication with directly affected parties and the wider public, at both local and national levels, has been characterised by inconsistent and poorly documented data. In particular, it is a matter of concern that the promotional economic assertions presented to the wider public do not fully align with the specific technical evidence currently undergoing scrutiny by the Examining Authority.
1. Underestimation of Heritage Impacts: The Vale (Non-Designated Heritage Asset)
• The Evidence: I am a resident of The Vale, [redacted] In the Environmental Statement, the Applicant has downplayed this Non-Designated Heritage Asset (NDHA) by categorizing its baseline value as "low," assigning a pre-mitigation magnitude of impact as "low adverse," and predicting a permanent "negligible adverse" significance of effect.
• The Conflict with Local Planning Policy: This assessment directly contradicts the formal findings of South Norfolk Council, which has highlighted the building's regional architectural and historical value. The asset features a rare Victorian social welfare double-cruciform plan—one of only two such examples remaining intact across the United Kingdom.
• Planning Relevance under NPS EN-1: Introducing close-range overhead lines and heavy lattice pylons into the immediate vicinity would severely erode the building's rural, open setting and physical character. This represents a meaningful, permanent reduction in its overall heritage significance, which has not been adequately recognized by the Applicant.
2. Deficiencies in Local Consultation and Unresolved Community Impacts at The Vale
• The Evidence: On 12 June 2026, agents from UK Power Networks visited our site alongside our land agent and a small group of residents. This followed three separate prior consultations: an initial on-site discussion with UK Power Networks (February 2024), an online follow-up meeting, and a subsequent meeting with Fisher German (July 2025). These discussions initially centred on proposals to excavate our rear car park and subsequently our sole access driveway to reroute a lower-power line before the primary proposed lattice pylons are constructed outside our perimeter.
• The Unresolved Risks: Residents have consistently presented safer, less disruptive alternatives at every juncture. Severing or destroying our single access driveway risks isolating 36 households, [redacted]. Furthermore, due to an absence of accurate underground pipe schematics, excavation introduces a substantial risk of catastrophic utility damage. Despite receiving prior assurances that these concerns would be escalated to National Grid and resolved, the Applicant re-submitted an identical, unaltered proposal prior to the June 2026 meeting. No further updates have been provided since.
• Cumulative Construction Harms: When combined with the intention to utilize the adjacent field on the opposite side of The Vale for storage and offices, as well as works for pylons assembly, residents face being hemmed in from all angles by heavy civil works. This introduces prolonged exposure to noise, air pollution, heavy load construction traffic, and local road closures, fundamentally disrupting the local countryside and wildlife. Residents here, as in other parts of the region along the pylon route, are therefore asked to bear a deeply disproportionate cost—facing severe financial loss (devaluation of their properties), the destruction of countryside and wildlife, and years of major disruption for a nationwide strategy.
3. Contradictory Marketing Initiatives and Community Fund Distributions
• The Evidence: Many residents along the proposed pylon route have recently received marketing cards from the Applicant seeking feedback on how to allocate an anticipated "Community Fund" exceeding £30 million, contingent upon the project receiving development consent. This material highlights opportunities to support green spaces, community areas, and physical health and well-being.
• The Policy Paradox: While local communities acknowledge the standard nature of community benefit funds, the distribution of promotional literature emphasizing the preservation of health, well-being, and green space stands in direct opposition to the physical reality of the scheme, which involves the widespread modification and industrialisation of the local countryside. This reliance on generic marketing materials masks the devastation their proposal will cause, and cannot substitute for a rigorous, site-specific minimization of localized devastation to interested parties.
4. Financial Risk and Procedural Prejudging via Advance "Enabling Works" Applications
• The Evidence: The Norwich to Tilbury project has been consistently presented to the public by NG as the most cost-effective and economically prudent pathway to achieving Net Zero targets. However, the Applicant's mid-June 2026 communications to local councils and landowners reveal a parallel strategy: submitting advance town and country planning applications for "enabling works"—including construction compounds and haul roads—prior to the main Development Consent Order (DCO) receiving final approval.
• Procedural and Economic Implications: This approach introduces two critical concerns for the examination process:
1. Procedural Fairness: Constructing or applying for heavy infrastructure prematurely risks creating an artificial impression that the final DCO approval is a fait accompli, thereby confusing local communities and subtly undermining the regulatory integrity of the Planning Inspectorate's ongoing examination.
2. Prudent Use of Consumer Funds: This strategy forces electricity bill payers to underwrite highly speculative infrastructure. Should the main project ultimately be modified or rejected by the Secretary of State, consumers would bear an unjustifiable financial burden: first to construct unnecessary access routes, and second to fund the subsequent landscape restoration and reversal works.
5. Parallel Media Campaigns during Active Examination and Trustworthiness of Information under NPS EN-5 (Section 2.11)
• The Evidence: The formal public consultation phase has closed, and this project is under active examination. Despite this, the Applicant recently launched a high-profile, sponsored national newspaper campaign (The Sun and The Times –

July 1st 2026) which seems to be designed to still shape public perception during the active examination phase of the Norwich to Tilbury project.

- Infringement of Consultation Balance: Disseminating a highly selective corporate narrative outside the formal examination framework creates an unaccountable "dual narrative" that inadvertently bypasses the rigorous, evidence-led scrutiny of the Planning Inspectorate. This is exemplified by public relations materials that promote pylons as an aesthetically appealing choice, trivializing their impact by noting they have been part of the landscape for nearly 100 years, highlighting different "styles", and referencing a "Pylons Appreciation Society". This represents blatant, non-objective advertising for a preferred overhead route over less intrusive, less devastating underground or offshore alternatives.
- Non-Compliance with Cost Transparency (NPS EN-5 Section 2.11): The national promotional texts weaponise a baseline "4.5 times more expensive" multiplier to summarily dismiss undergrounding options along the 180km corridor, without providing a transparent, itemised calculation within those public spheres. Under NPS EN-5 (Section 2.11), any evaluation of alternative grid options must be based on a comprehensive assessment of whole-life costs—including upfront capital expenditure, long-term operational costs, maintenance cycles, lifetime cost savings achieved by reducing energy loss during transmission. By presenting un-itemised capital costs in its public relations, the Applicant fails to provide the objective transparency required for a legitimate examination.

Conclusion

In light of the policy requirements of NPS EN-1 and NPS EN-5, I respectfully ask that the Examining Authority require the Applicant to reconcile the discrepancies between their public PR claims and the formal evidence base.

In particular, the Applicant should be compelled to provide
a fully itemised, life-cycle economic breakdown of alternative routing and undergrounding costs to justify their public "4.5x" headline figure.

Yours faithfully,

Flora Leone