

National Grid (NG) Norwich to Tilbury Project: Planning Inspectorate Comments

Principal Location Ref: Gislingham & environs: Suffolk

Having read and interpreted revised documentation issued by National Grid (NG), UK Gov. Planning Inspectorate and others we submit this revised response.

Where there are significant changes to our original response these are noted (as here) in bold italic.

1. The project related to Gislingham Parish and its environs.

Although we sympathise with NG's proposals to reposition the overhead transmission line between pylons RG112 – 117 north west of the former 2024 proposal, creating an additional pylon and installing an angle pylon RG117 closer to the Norwich to London railway line we continue to believe this project will have a significant and potentially catastrophic effect to our local environment. Even with the revised pylon alignment, the pylons themselves and associated infrastructure will continue to dominate our community. Where sited behind existing woodland, these structures continue to be significantly higher than the natural woodland and the overall effect of the re-positioning is minimal. This continues to be a direct contravention of the Holford Rules. Furthermore, the existing, unaltered pylon route to the northwest and especially, the south (through Spring Farm) will site intrusive structures well above the existing tree line and continue to dominate our community. Furthermore, all existing trees designated as "screening" are deciduous and will leave all pylon structures highly visible during the winter months.

Additionally, it has now become apparent, the alignment of the pylon route has been moved several 100 Metres west of the original plan. This is evidenced by the current drilling and site investigation locations which are taking place now (1st August 2026). This is a further example of NG's willful manipulation of the planning process to advance own gain and effectively circumvent any adverse criticism.

We also believe repositioning the works compounds from the front of Spring Farm to the new site north of the Thorham Road and adjacent to the railway, will have limited beneficial results including minimising unnecessary disruption to the flora & fauna in the areas between Spring Farm and the Thornham Road.

However, we are grateful the specific concerns of residents, environmental groups, councils, councillors, local and national groups appear to have been considered including preserving some of our historic meadows and trees from destruction including those with specific preservation orders adjacent to the Thornham Road and the historic avenue of Chestnuts between Thornham Road and Spring Farm.

We appreciate the intention to integrate some aspects of the new design to incorporate some screening using natural features including historic woodland between Thornham Road and Greens Farm and those adjacent to what will remain of the Green Lane path however, these natural assets continue to be dwarfed by the overall height and general impact of the pylon structures which continue to be in full view of our village community.

Although the revised plan submitted to the Inspectorate September 2025 has limited merit (noted above) there remain serious objections and concerns regarding this project and its effect on our community. These have been detailed in feedback to the original consultations by many residents and

individuals, environmental groups, local and county councils, councillors, our MP, plus local and national organisations.

Of specific concern remain the following:

1.1. The continuing use of parish roads.

Access and bellmouths are proposed on Thornham Road/High Street as it enters Gislingham to facilitate access to the construction compounds to the north and south of the Thornham Road. To access this road will require construction traffic to enter/exit the village via the High Street, Finningham Road, Mill Street or the Burgate/Mellis roads. These compounds and associated works will have at its epicenter the narrow London to Norwich line railway bridge, constructed in 1849 which was never designed to be part of any major construction complex.

Access west/east through the village would be via Mill Street, again a narrow rural road with a single track plus passing places where it narrows at the historic River Dove bridge and Mill House.

None of these roads or bridges were ever designed to carry heavy construction traffic or associated works vehicles. Deploying parish roads as site access routes, with signal control and sporadic closures as intended, would mean significant disruption to residents who rely on these to travel to and from work, schools, essential amenities etc.

No thought has been given to resident requests for Emergency access in the event of Fire, Medical or Police matters. On-going disruption is intended to last 3 years or more, for construction and subsequent project maintenance. All residents have expressed genuine concern and NG have declined to provide any practical response other re-positioning of bellmouths designed to accommodate additional construction traffic and associated service vehicles.

Consequently, local traffic, through traffic and construction traffic will be driven onto the roads away from those specified for construction traffic.

Additionally, new evidence has emerged, (thanks to HM Government Planning Inspectorate surveys), evidenced by notices posted within our parish, of NG's intention to acquire additional areas that are not included in NG's original plans submitted for Public Consultation. These include areas to the east of Mill Street, significant proposals to widen Coldham Lane (to facilitate construction of the double pylon structures required to cross the railway line), additional access points in Mellis Road, Burgate Road and Thornham Road plus those east and west of the narrow Norwich to London railway bridge. As stated above, these never appeared in the original plans and have been added by NG without any consultation. The net result will mean ALL roads into and out of our parish will be affected. These are detailed as follows:

Back Street: A single track with limited passing places. Housing, no pavement, no lights. Used by many walkers, horses, local traffic and farm traffic.

Finningham Road: Mostly 2 lanes but with a significant number of pinch points including passing places. No pavements, no lights. Used by horses, local traffic and farm vehicles.

Mill Street: Mostly 2 lanes with some pinch points. Highly populated, no pavements. Common route for children walking to school. Also used by local traffic, school traffic, horses, school buses and farm

traffic. The historic narrow bridge over the River Dove was never designed to facilitate this concentrate of construction and construction related traffic.

Burgate Rd: Mostly single track with passing places. No pavements, no lights. Used by buses and local traffic going to Diss. Used by many walkers and cyclists.

Mellis Road: Narrow road with pinch points and passing places, no pavement, no lights. Used by school traffic (going to Mellis Primary) walkers and cyclists.

Thornham Road (identified as Major Lane on NG's revised plan): 2 lane traffic which is the main road to join the A140. Used for up to 1,000 car journeys local and through traffic per day, school buses to and from Hartismere High School, horses and farm traffic. Access to this road is via the centre of Thornham village where it is single carriageway with some passing places.

Within Gislingham, even with the revised proposals, a section of this road remains very close to the edge of the residential part of the village and falls within the "red line" designated to form part of haul roads and the proposed bellmouth. Even though this has been moved 200m east this will cause significant disruption to residents travelling east out of Gislingham, which a significant percentage of our residents do on a daily basis and will drive traffic onto less suitable roads, increasing congestion, pollution, and risk of accidents.

NG have estimated that the peak construction time will be 2029 with an estimate of 127 HGV's 7 days a week for 4 years plus 94 light goods vehicles, plus an unknown number of workers vehicles. With an average 1 HGV every 5.5 minutes that means an increase in a 12-hour day, weekday flow of 371%

Community and School buses collect from and travel along Mill Street, Mellis Road, Thornham Road and Back Street.

Roads will have traffic management (lights and delays) with significant impact on emergency access by Police, Fire and Ambulance services.

The envisaged speed limit on the haul roads will be 60mph – in an area that has wildlife and where efforts will be required to reduce noise and dust pollution.

All local roads will be impacted and degraded even though they don't have direct construction traffic. Many have not received significant maintenance for many years and their degraded state will be intensified by construction traffic, especially those carrying heavy loads.

The hours of construction are far too long, at 7 to 7 Mon to Fri, 8 to 5 Sat, Sun, and every bank holiday – for 3 to 4 years.

The vibration caused by this traffic is of concern particularly when close to buildings and in one case a Grade II listed building, which will only be 175m from a pylon RG119 (Spring Farm) a minimal change from NG's previous plan.

Since the revised plan was submitted additional construction activities have been reported and NG's Land Agent: Terra Quest have announced their intention to include additional areas to the west of Mill Street, alterations to drainage ditches to the south of Thornham Road and the potential widening of Coldham Lane including the entrance drive to Spring Farm. These additions do not feature within any of the consultations. The latter would involve the removal of a heritage 500 year old oak tree.

We fail to see how these additional works could benefit any “biodiversity net gain” associated with this project (***Please note, these issues are reiterated in summary above***).

1.2: Flooding, pollution and related issues

In response to the Statutory Consultation July 2024 by our elected representatives, Parish, District and County Councils and our MP have highlighted significant errors in the design and consultation process. These include on-going concerns regarding the protection of our environment, the immediate effect and after effect of extensive excavation works, the construction and de-construction of haul roads, re-direction of field and river drainage and general damage envisaged by intensive construction activities.

Although the revised plan does include some welcome changes (noted in point 1 above) it does not detail the potential effects of major alterations to drainage systems located in pastures North, East and South of Gislingham parish. Many of these systems are ancient and fragile. Farmers have noted the effect of proposed security fencing which will necessitate boring holes and concreting through field drainage systems, associated ditches, underground drains and pipework. With terrain to the north and east of Gislingham parish providing natural drainage into the River Dove concerns continue about the effect this will have on our community.

Additionally, the revised plan indicates a further construction linking Mellis Road to the construction area designated as within the red line draft order limits. This runs parallel to or actually forms part of the River Dove. This construction will cross existing spring lines and re-cross the river between pylons RG17 and RG18. Any damage caused by run-off sediments, ground pollution or excessive ground compaction could have a catastrophic effect on the river which passes through Gislingham, neighbouring towns and villages including Thornham Magna, Stoke Ash and Eye on its way before joining the protected River Waverney near Hoxne.

Gislingham experienced significant flooding in 2024 with only 1 single track road in and out of the village accessible for part of the time and repeated flooding at Thornham Road, Finningham Road and Mill Street. These are the same roads designated to take construction traffic (see 1.1 above). Developing settled agricultural land, building roads and associated drainage gully's is bound to have a detrimental effect, with issues such as potential pollution, run off and damage to our heavy clay subsoil drainage infrastructure.

At the statutory consultation, a representative from NG stated they knew where the flood plain was but, as it was pointed out, this does not always equate to where flooding occurs. If all roads are blocked, and their access points flooded, how can our community manage the disruption?

NG are fully aware of these issues. This is evidenced by the questionnaire submitted to residents by Terra Quest Data Solutions 23/07/2024. This questionnaire arrived unexpectedly and was printed in such a primitive manner it aroused suspicion. After taking legal advice, I was advised not to submit any personal details or comment on any legal information regarding the ownership of our property unless we were certain the enquiry and the enquirer were genuine. After 19 hours of telephone investigation in which NG officers stated they had no knowledge of Terra Quest as an organisation or its relationship with NG, I finally located the sender. During a transcript conversation with the Terra Quest Project Manager, I was advised details of our property were required as we could expect “disruption, noise pollution, light pollution and potential flooding”.

NG's original and revised environmental reports submitted for the targeted consultation do not reference these as any potential issue of undue concern. This is clearly, an incorrect proposition.

Since this initial response (all of which remain pertinent issues) there have been significant drought summers. Consequently, the effect of dust pollution during all construction and subsequent maintenance work remains a significant and unresolved issue.

1.3. Effects on our historic buildings and environment.

The revised plan submitted for the targeted consultation does indicate some welcome changes (noted in 1.1. above) however even the revised pylon route will have a profound impact on our natural landscape and physical environment.

The historic landscape North of our community will continue to be dominated by pylons and associated overhead transmission equipment. The setting of our village within its historic landscape will be severely affected and from certain locations including entrance from East and North will remain dominated by these new constructions. Its relationship and setting within the traditional agrarian landscape will be severely affected or destroyed.

The severe number of route changes as deviations from a straight line remain acute. According to NG plans, to accommodate the route between Shelfhanger and Finningham alone, there are at least 16 directional changes in addition to a giant curve in the route to avoid Roydon and Diss. This is contrary to NG's own guidelines. Again, a direct contravention of the Holford Rules".

Additionally, although it does not form part of Targeted Consultation: Suffolk 2, damage caused to the North of, and adjacent to, historic Mellis Common remains acute. This Common and its environs are a designated Special Landscape and Conservation Area, managed by The Suffolk Wildlife Trust. The destruction of areas adjacent to this unique environment and its replacement by a vast construction site designed to erect 50M high pylons will be profound and long-lasting. The visual prospect north of Gislingham will be entirely dominated by pylons and the effect on our environment and wildlife will be acute.

As noted in the statutory consultation Gislingham parish contains many listed buildings with 38 buildings on the National Heritage List for England and many more with important historical features. The proposed development will cause permanent damage to the significance of Gislingham and its historic setting. The National Policy Planning Framework (NPPF) defines significance as "the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting."

Retaining the setting of Gislingham within its ancient and historic landscape is of paramount importance.

Additionally, detail has already been provided to NG relating to our historic buildings.

These include:

Grade I listed Church of St Mary, the oldest and most significant historic building in Gislingham and its setting will be permanently affected by the proposed pylon route, as noted above, the continuing insistence by NG to use our parish roads for heavy construction traffic will bring a considerable amount of traffic and construction works that may cause irreparable harm to the medieval church fabric and

churchyard, both of which are in constant use. ***The churchyard wall is within 1M and the building itself within 11M of a road designated for use by heavy construction traffic. Currently, the 17th Century bell tower is, at 18.3m, the tallest building in the village. This will be dwarfed by the 50m pylons that will harm the setting of this and other listed buildings in the village, especially when viewed from approaches to the North, South, East and West. Grade I listed churches are specifically noted in the NG Design Development Report as reasons for route decisions (e.g. 5.4.39, 5.4.43). In Waveney Valley, the setting of a Grade I listed church is a key factor in the (rejected) proposal to underground there (5.4.51). Again, this is in direct contravention of the Holford Rules.***

The neighbouring Church Farmhouse (Grade II listed) and Ivy House Farm (Grade II*listed) will be similarly affected as will other historic timber-framed buildings within the village.

All listed buildings situated to the North of the village will have their views and setting adversely affected by RG108-RG116 e.g. The Old Guildhall (Grade II*). This has been exacerbated by the proposal to realign the route at Mellis further west (NG Design Development Report 5.4.64.) Those that lie to the East of the village e.g. Hidcote House/Laurel Farmhouse (Grade II) will have their setting affected by RG117-RG124. The siting of RG113 to RG116 on the highest land anywhere in Gislingham will compound the negative impact on the unique landscape and the historic setting of the village, adversely impacting the residential amenity for the entire village.

Of particular concern is the permanent effect on Spring Farm, Gislingham. NG's documentation recognises the setting of this listed building but the proximity to Spring Farm (Grade II) is far closer than it should be and impact on its setting and on the views enjoyed by many walkers, both local and visiting holidaymakers is significant. Also, this site has a designated medieval moat: (Heritage.suffolk.gov.uk/Monument/MSF15878). NG's revised plan removes the construction compounds from the delicate pastures and woodland in front of this historic property to areas adjacent Norwich to London railway line. This is a welcome revision, however the re-alignment of red line draft order limits to include works areas and haul roads to the east of the farmhouse and the repeated inclusion of the farm access railway bridge utilised to construct pylons RG 119 and RG 120 will have a significant impact on this property, its owners and our environment. Pylons RG118, RG119 and RG120 will remain within 800M of the centre of the village and within 400M of adjoining properties. The site of RG19 will remain unacceptably close to Spring Farm and part of the hideous RG119 – RG120 double pylon construction required to cross the railway line. Even with the revised plan Pylons RG116 – RG121 will remain significant features and dominate the historic setting of Gislingham with long-term detrimental effects to our environment. The additional proposal to widen Coldham Lane, (incorporating the principal access drive to this property) to facilitate through traffic required to construct the double pylon (RG119/RG120) over the railway line is of especial concern as it will require the entire re-construction of this narrow road and the complete removal of several ancient oak trees, old, established hedgerows, residential property driveways and woodland habitats.

The net result will be to cause irrevocable harm to this historic property, its location within a historic agrarian setting and specific damage to its noted historic monuments and archeological sites.

NG reports continue to state there is no suitable mitigation to reduce the “significant negative effect”. Given the permanent nature of the impact on Spring Farm by pylons RG117-119, we believe the owners and adjoining residents should be formally consulted regarding their wishes including sensitively designed and accurately costed proposals for going underground or alternative construction routes to completely avoid Gislingham parish altogether.

2. The consultation process.

We have previously described our frustration with the vagaries of NG’s consultation process. I quote from our original response to the Statutory Consultation July 2024:

“NG’s flawed “consultation” process was apparent from the start. For example, at the information event at Palgrave, Suffolk on 14th May 2022 visitors were expecting an opportunity to assess and comment on various proposals. Instead, NG insisting this would be the only one...

Furthermore, at this event we were advised by NG representatives Pylons and all superstructures would be the same as those on the existing Norwich to Bamford route. This was untrue as Norwich to Tilbury pylons will be significantly higher, (50M as opposed to the existing 35M), designed to carry significantly more power (400Kva as opposed to the existing 320Kva) and form part of a new “power corridor”. The reason for significant additional height is NG need to ensure safe accommodation of 400Kva capacity. The new pylons will be significant structures, among the largest to be envisaged for any overhead power supply in the UK. This information was deliberately withheld at the Palgrave event.

If overground Pylon design is so fundamental and essential to this project, why were NG representatives permitted to impart biased and misleading information?

There are more examples:

At a Public Information event, Gislingham, Suffolk on 30th April 2024, NG representatives outlined the “project formed part of a “power corridor” to link offshore wind generation in the North Sea and “international sources” including Scandinavia. Undersea cable construction from Scandinavia is a substantially larger project than the Offshore Grid proposed by construction analysts. If electrical distribution from international sources via undersea cabling is permitted – why has Offshore Grid and associated options been dismissed?

The route has not fundamentally changed since inception. As part of the “Non-Statutory Consultation” experts (and the writer) noted design of NG’s original “Graduated Swaithe” was based on old, out of date maps. Residents and communities noted modern housing development and other details did not appear in the plan. NG also failed to acknowledge the presence of an airstrip south of Wortham, Suffolk. To avoid this, NG planners were obliged to re-design the route further south which means additional curves and steps necessitating additional pylons and associated superstructure. These add significant costs to the total financial figure predicted by NG which remains substantially the same.

Implicit in the formal planning process is NG proposing this project for HM Government funding. With other options inadequately explored, why is the overground pylon scheme recommended above others? Furthermore, the “cheapest” option may not be the best especially when long-term effects, health and wellbeing of communities, the environment and other factors are taken into consideration.

When planning infrastructure required for the “Great Grid Upgrade” and process towards Net Zero Carbon Emissions, a major, publicly funded organisation such as NG should be exemplifying the very best in planning and process. Instead, we find this is very far from the case. NG’s continued misrepresentation and confusion have led to a complete breakdown in confidence among those who will, ultimately, fund this project via taxation and increased electricity costs. Worthy critics who, if listened to, could and should be enabled to contribute to the debate would enhance quality decision making and enable this project to be a genuine and positive contribution to our environment and energy future.”

Similar anomalies have been noted in detail by our Parish, District and County Councils, Adrian Ramsay our MP for Waverney Valley, English Heritage, The National Trust, Natural England, Council for the Preservation of Rural England (CPRE), numerous community groups and individuals across East Anglia and beyond.

Sadly, these anomalies have continued:

The timeframe for Targeted consultations including Suffolk 2 remains far too short with a minimal 4½ week consultation period. This prevents adequate analysis and reflective comment from those who are directly affected by this project.

In the explanatory documents attached to the consultation Feedback Questionnaire, NG include the following:

“We also considered moving the pylons west from the village, but this would increase impacts arising from proximity to properties.”

Where are these proposals? Why were these designs withheld? What are the potential costings, advantages and disadvantages?

Denying residents and elected officials, this detailed information indicates a lack of clarity and transparency. Why not allow sufficient time to develop these proposals and receive constructive feedback? Feedback and constructive criticism would increase transparency, engender collective support and increase the quality of decision making.

Additionally, the Environmental Reports produced by NG are over-complicated, difficult to read and interpret. They constantly underestimate environmental effects (including those noted above). A constant phrase used is “no change”. Regrettably, this cannot be the case. Environmental effects and wellbeing of residents are consistently underestimated indicating these reports are not independent and biased in favour of NG’s plan.

For reasons noted above, due to an abundance of incorrect and prejudiced information we are increasingly wary of literature issued by NG in newsletters, project information documents, plans and reports. For example, in NG’s Community Newsletter January 2025 indicated comparative costs have been calculated for AC, HVDC and subsea cables, yet no plans are available for these alternative methods of distribution. If there are no plans, how can they be analysed or accurately costed?

We continue to believe the cost of this project as submitted to HM Planning Inspectorate has been significantly underestimated.

NG is intent on placing profit for itself, its financial backers and shareholders before performance and significant rising costs will be passed on to consumers through increased electricity costs at a later date.

We also believe the hasty planning and poor technical specification will lead to rising costs for post-construction maintenance. Again, these will be passed on to consumers by rising electricity costs at a later date.

There are no alternative routes other than the current Norwich to Tilbury project plan. Why are there no alternative, fully costed routes under consideration?

An alternative plan avoiding the Suffolk 2, Gislingham pinch point, would have received much support from residents and avoid significant the disruption to our community.

Additionally, published comment in successive NG Newsletters describes pylon transmission as "...designed to be safe". The references quoted (World Health Organisation and UK Health Security Agency) are only part of an on-going analysis which is much more nuanced. The World Health Organisation details many anomalies in research and the University of Oxford ORA have published a respected and definitive report linking Electro Magnetic Fields to childhood and adult Leukemia.

Even with the revised proposals detailed in Suffolk 2, the entire centre of Gislingham, including our Preparatory and Junior Schools, will remain unacceptably close (800M) distance from pylon RG19.

Additionally, the effect on mental health for us and residents cannot be ignored. The constant stress of feeling obliged to interpret, understand and respond to complex technical reports and short specific deadlines for accurate, considered responses are extremely difficult especially when sustained over many years since this project's inception. Constant concerns over the fall in individual property prices (for many, the main source of individual wealth in our community) mean residents can expect a worrying and uncertain future for themselves and their families. Rumours of associated community funding for the most vulnerable communities remain vague and little more than a "bribe" on behalf of NG to accept their highly controversial and dangerous proposals.

We also believe the economic impact of this project is grossly underestimated. The fall in value of residential property (estimated widely as between 25% – 30% of total value) combined with the decline in tourist numbers (exacerbated by the intensive construction works), closure of footpaths FP267/021 near pylon RG120, FP267/022 near pylon RG119, FP267/014 and FP267/014A RG114 & 15 and repeated road and traffic congestion, will make our community a difficult place to live, work and commercially prosper.

The effect within Gislingham (Suffolk 2) is comparable with other sensitive communities and specific locations throughout the entire Norwich to Tilbury route including: Norfolk 1 – 4, Suffolk 1 - 1A, 3 – 6, and those under consideration in Essex.

We continue to believe, in the 21st century, responsible, publicly funded organisations should be exemplars of good practice. Instead, this project appears to exemplify all that is worst in post-industrial design, planning and construction. If permitted to go ahead it would become known, historically, as an ill-conceived plan, hastily delivered and one of the worst examples of electrical distribution in modern UK history.

Once again, we request urgent action be taken to address points noted above before proceeding to the next stage of the planning process and to actively request a complete revision and a fully considered alternative to the current NG Norwich to Tilbury plan.

This document submitted by [REDACTED] also reflects the thoughts and objections of [REDACTED]

2nd August 2026

Interested Party Ref. No: [REDACTED]