

Submission to the Planning Inspectorate: Norwich to Tilbury Project (EN020027)

Interested Party Reference: [REDACTED]

Final Written Submission on Alternatives, Consultation Process, Project Timeline, and Public Health Considerations

1. Executive Summary

My final submission examines the parity, objectivity, and transparency of the assessment of overhead pylon proposals against alternative options for the Norwich to Tilbury project. It addresses concerns regarding the consistency of information provided during the consultation phase, the baseline data used to evaluate project timelines, and the completeness of the financial and health risk assessments presented to date.

2. Evaluation of the Consultation Process and Alternatives

A key principle of effective public consultation is that interested parties must be provided with sufficient, simultaneous information to allow for meaningful consideration and response. There are many indications that the evaluation of alternative options was not fully balanced during the formative stages of the project.

Availability of Baseline Assessments

This data gap is highlighted by information shared by James Cartlidge MP regarding a meeting on 18th July 2022 involving MPs, Ofgem, and National Grid.

- When requested to provide specific evidence and costings for the offshore alternative, National Grid indicated that the assessment would be published later that summer, thus implying if not clearly stating that it had not yet been carried out.
- This suggests that during critical initial stages of public consultation, conclusions regarding the unfeasibility of an offshore route were reached before the formal comparative data had been fully compiled.
- As a result, stakeholders were asked to provide feedback without equal access to the technical and economic evidence underpinning the dismissal of alternative strategic options.

Absence of Alternatives in Public Consultation Materials

Furthermore, during the early stages of public engagement, the marketing literature and consultation brochures posted directly to interested parties completely omitted any comprehensive details regarding alternative delivery methods. By focusing almost exclusively on the overhead pylon design, the communication materials did not inform the public that alternative technologies were under active consideration. This lack of initial documentation restricted the ability of affected residents to engage in an open and balanced dialogue from the outset of the process.

Presentation of High-Level Cost Multipliers

Where marketing materials did make passing references to alternatives, they relied on generalised cost multipliers—such as asserting that underground options were 4.5 times more expensive and offshore options were 11 times more expensive than overhead lines. These flat multiplier figures were presented as definitive conclusions without the detailed, project-specific data necessary to substantiate them. Presenting high-level multipliers without a localised breakdown does not substitute for a meaningful consultation on alternative designs.

3. Review of the Deadline 7 Environmental Statement

In the Deadline 7 Environmental Statement (Chapter on Alternatives), alternative technologies appear to be set aside primarily on the basis of high-level capital cost estimates and operational constraints:

1. Onshore HVDC Underground Cables: Discouraged due to the projected capital cost of converter stations, cited at £250 million to £350 million.
2. Offshore DC Transmission: Discouraged based on the estimated costs of specialist marine infrastructure, converter stations, and longer construction timelines.

Insufficient Detail and Substantiation of Costs

The cost figures presented by the Applicant are excessively generalised. Blanket estimates—such as the £250 million to £350 million cited for converter stations—are presented without the itemised backing data required to verify their accuracy.

4. Assessment of Project Timelines and Capacity Demands

The extended delivery schedule of an offshore alternative is frequently cited as a primary reason for its exclusion, based on the necessity to meet 2030/31 network targets. However, this rationale warrants closer scrutiny:

- Capacity Projections: Independent analyses and local representations have suggested that the future energy capacity requirements for the project may be overestimated.
- Review of Urgency: If the anticipated capacity demands are lower or develop over a longer horizon than initially projected, the necessity to meet an absolute 2030/31 deadline is reduced.
- Opportunity for Comprehensive Analysis: This potential overestimation provides an opportunity to pause and conduct a thorough, side-by-side analysis of offshore and underground alternatives, ensuring the final infrastructure selection is optimal for the long term.

5. Requirement for an Itemised, Whole-Life Cost Breakdown

A transparent, fully itemised cost breakdown of all strategic alternatives is essential for a robust options appraisal under standard planning guidelines. I have not found in the current documentation a comprehensive, side-by-side comparative ledger that mirrors the detailed frameworks presented by other participants, such as Page 2 of the Pylons East Anglia Deadline 6 submission.

To ensure a balanced evaluation, an objective assessment should explicitly itemise and quantify the following factors:

- Lifetime Power and Transmission Losses: The relative operational efficiency profiles of overhead AC lines versus HVDC alternatives over a set lifespan.
- Community and Socio-Economic Impacts: The long-term direct and indirect economic implications for the host communities.
- Impact on Local Property and Land Values: The quantifiable long-term effect on residential, agricultural, and commercial property values along the proposed corridor.
- Natural Capital and Environmental Valuation: The economic value of permanent modifications to the landscape, local ecosystems, and tourism, which alternative routing methods could preserve.

6. Public Health and Electromagnetic Field (EMF) Considerations

It is my view that the current characterisation of public health risks within the project documentation would benefit from

greater specificity. It seems to me that the assessment currently relies on broad conclusions that risks are "low," which does not fully address local concerns.

- Vulnerable Groups and Medical Implants: Clearer, data-driven assurances are required regarding the potential impact of Electromagnetic Fields (EMF) from high-voltage overhead lines on individuals living in close proximity who rely on implanted medical devices, such as pacemakers or defibrillators.
- Precautionary Approach: Establishing definitive safety thresholds and concrete protection boundaries is essential to satisfy the duty of care to local residents. These specific risks would be substantially minimised through an offshore approach.
- Unaddressed Pollution and Mental Health Impacts: The cumulative impact of noise, air, and light pollution during construction works, alongside the resulting negative effects on the mental health of interested parties since the inception of this project, represents a severe reality that has been entirely unaccounted for. These adverse health outcomes are entirely avoidable by selecting less disruptive alternatives

7. Conclusion and Action Requested

To ensure a fully robust and legally sound decision, it is my view that the evidence base regarding alternatives requires further development. The current preference for an overhead pylon route relies on early-stage exclusions, communication literature that omitted alternative designs in favour of blanket cost multipliers, timeline constraints linked to potentially inflated demand forecasts, and high-level, unsubstantiated cost assessments that leave community concerns unresolved. I respectfully request that the Examining Authority direct the Applicant to provide a comprehensive, itemised, whole-life cost matrix for all viable alternatives—fully incorporating detailed technical cost breakdowns, natural capital valuations, property impacts, and a thorough public health assessment—before finalising its recommendation to the Secretary of State.