

# Planning and Highways Delegations Committee

Date: **Monday 10 June 2024**

Time: **2pm**

Venue: **Council Chamber, County Hall,  
Martineau Lane, Norwich**

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## Committee Membership

### Voting Members:

Cllr James Bensly  
Cllr Andrew Jamieson  
Cllr Graham Plant

### Non-Voting Members:

Cllr William Nunn  
Cllr Mark Kiddle-Morris  
Cllr Paul Neale  
Cllr Steve Riley  
Cllr Mike Sands

**For further details and general enquiries about this Agenda please contact the  
Committee Officer:**

Hollie Adams on 01603 223029 or email [committees@norfolk.gov.uk](mailto:committees@norfolk.gov.uk)

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## A g e n d a

1. To receive apologies and details of any substitute members attending

2. Election of Chair

To elect a Chair from the Voting Members of the Committee.

3. Election of Vice-Chair

To elect a Vice-Chair from the Voting Members of the Committee.

4. Minutes of last meeting

To agree the minutes of the meeting held on 8 September 2023

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5. Declarations of Interest

If you have a **Disclosable Pecuniary Interest** in a matter to be considered at the meeting and that interest is on your Register of Interests you must not speak or vote on the matter.

If you have a **Disclosable Pecuniary Interest** in a matter to be considered at the meeting and that interest is not on your Register of Interests you must declare that interest at the meeting and not speak or vote on the matter

In either case you may remain in the room where the meeting is taking place. If you consider that it would be inappropriate in the circumstances to remain in the room, you may leave the room while the matter is dealt with.

If you do not have a Disclosable Pecuniary Interest you may nevertheless have an **Other Interest** in a matter to be discussed if it affects, to a greater extent than others in your division

- Your wellbeing or financial position, or
- that of your family or close friends
- Any body -
  - Exercising functions of a public nature.
  - Directed to charitable purposes; or
  - One of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union);

Of which you are in a position of general control or management.  
If that is the case then you must declare such an interest but can speak  
and vote on the matter

**6. Any items of business the Chairman decides should be considered  
as a matter of urgency**

**7. Norwich to Tilbury Overhead Power Line Proposal – Statutory  
Consultation by National Grid**

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Report by the Director of Growth and Investment

**Tom McCabe**  
**Chief Executive**  
County Hall  
Martineau Lane  
Norwich  
NR1 2DH

Date Agenda Published: 31 May 2024



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## **Planning and Highways Delegations Committee**

**Minutes of the Meeting held on 8 September 2023 at 10am  
in the Council Chamber, County Hall, Norwich**

### **Voting Members Present:**

Cllr Graham Plant	Cabinet Member for Highways, Infrastructure and Development
Cllr Eric Vardy	Cabinet Member for Environment and Waste

### **Non-Voting Members Present:**

Cllr Brian Long	Planning (Regulatory) Committee Chair
Cllr Mike Sands	Planning (Regulatory) Committee Labour Group Spokesperson

### **Officers Present:**

Hollie Adams	Committee Officer
Stephen Faulkner	Principal Planner - National Infrastructure Planning Lead Officer
Joe Wyatt	Strategic Planner Apprentice

## **1 Apologies for Absence**

- 1.1 Apologies were received from Cllr Graham Carpenter, Cllr Andrew Jamieson and Cllr Paul Neale. Also absent was Cllr Steve Riley.

## **2. Election of Chair**

Cllr Plant was duly elected as Chairman for the municipal year.

## **3. Election of Vice-Chair**

Cllr Vardy was duly elected as Vice-Chairman for the municipal year.

## **2. Minutes**

- 4.1 The minutes of the meeting held on 26 October 2022 were agreed as an accurate record and signed by the Chairman.

## **3. Declarations of Interest**

- 5.1 There were no interests declared.

## **4. Urgent Business**

- 6.1 There was no urgent business discussed.

## **5. Norwich to Tilbury Overhead Power Line Proposal – Non-Statutory Consultation by National Grid**

The Committee received the report setting out National Grid's draft proposal and route alignment for their Norwich to Tilbury project and the County Council's

response to the non-statutory consultation.

The Principal Planner introduced the report to the Committee:

- Norfolk County Council also responded to the first stage of the non-statutory consultation in June 2022. The proposals for this project were due to be taken forward as a Nationally Significant Infrastructure Project (NSIP) and the final decision would be made by the Secretary of State.
- There would be further rounds of consultation where Norfolk County Council would be a statutory consultee, at the preliminary environmental Information Report (PEIR) stage for example, which would likely take place in spring 2024. Additionally, there would be further opportunity to comment at the formal submission stage in spring 2025 followed by a public examination in late 2025. If the project continued as planned, work could commence in 2027 and the project completed by 2031.
- The proposal included an 183km cable route including an overhead line of standard construction towers (45-50m tall) at intervals of 350m – 400m. In Norfolk new substations were proposed at Norwich Main and outside of Norfolk substations are proposed at Bradford and Tilbury. The substation planning permission at Norwich Main would be taken under the Town and Country Planning Act and would therefore be a decision for South Norfolk District Council.
- Of the proposed route for the project, 30 KM was proposed to be in Norfolk with 89 pylon towers.
- The project was proposed by National Grid to add capacity to the network to accommodate increases in offshore wind and the approval of Sizewell C.
- The proposed response and comments of the County Council were shown in section 3 of the report, outlining the key issues identified. These included:  
(a) requesting further consideration by National Grid of the offshore option;  
(b) in the event of the offshore option not being viable, undergrounding being taken forward across the route; (c) upgrading of existing overhead lines and evidence of where this can be done; (d) whether the proposed Grimsby to Walpole project would impact this project; (e) implications of the Vattenfall project; and (f) the need for mitigation around Diss and the Waveney valley.

The following points were discussed and noted:

- The Chair raised the Members' concerns set out in the report, especially those discussing the Diss area which would be impacted by installation of towers and cables.
- The Chair noted that no overhead cabling was proposed from offshore installations, and as such felt that underground cabling could be incorporated into this project. He recognised that underground cabling may increase the cost of the project however he felt that it would be better than overhead cabling as it would have less of an impact on the countryside and towns and villages along the route. The Chair also suggested that upgrading towers already in place would reduce impact on the countryside and residents.
- It was felt that some of the power from this project should be retained in Norfolk rather than simply being transported through the County.
- A Committee Member pointed out that the project would be judged against planning policy PPS1, and asked if it would be accompanied by a whole life carbon assessment, noting that producing and installing new pylon towers and replacing them at the end of their lifespan would produce a lot of carbon. A long-term environmental impact assessment would help identify which type of cabling would have the lowest impact on the carbon footprint. He

suggested that the voting members consider putting this forward as a proposal so that carbon impact could be considered at the next stage of consultation.

- Another Committee Member reported that substations/pylons in his constituency area had been noisy for residents, emitting a hum. Since underground cabling had been used this had not been an issue. He asked if Voting Members would suggest raising this as a proposal for addition in the Council's response. The Principal Planner noted that noise did not come under the County Council's statutory responsibility and would be picked up via Environmental Health through the District Council's planning process. He could, however, add this in through the public health section of the Council's response if agreed.
- The Chair noted that Cllr David Bills, the Norfolk County Council Labour Group and the local Parish Council had set out their objections to the proposals.
- The Vice-Chair pointed out that Cllr Catherine Rowett (West Depwade Member) had also commented about the proposals, asking whether power would be retained in the County for Norfolk's use.
- The Chair raised concerns that this being a Nationally Significant Infrastructure Project would over-ride concern held by local residents and members about protecting the local countryside, villages and towns in favour of the need to deliver the project and asked The Principal Planner, , to emphasise that Norfolk County Council should retain some of the power and for Norfolk to be protected.

The Committee **RESOLVED** to:

Agree the comments set out in the report and in the accompanying Appendix 2 be sent to National Grid and to the Department of Energy Security and Net Zero as the County Council's formal response to the Non-statutory Consultation on the Norwich to Tilbury route alignment.

The Committee also agreed to:

- Add an additional comment to the Council's response requesting National Grid to complete a detailed assessment of the whole life carbon cost of the project if overland; or underground;
- Add an additional comment to the Council's response under the Public Health section asking National Grid to consider the noise impacts caused by above ground transmission lines and mitigation measured needed; and
- Update the Council's response based on the points raised by Members during the meeting.

The meeting ended at 10:31

#### CHAIRMAN



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# **Planning and Highway Delegations Committee**

**Item No: 7**

**Report Title: Norwich to Tilbury Overhead Power Line Proposal – Statutory Consultation by National Grid**

**Date of Meeting: 10 June 2024**

**Responsible Cabinet Member: Cllr Graham Plant** (Cabinet Member for Highways, Infrastructure & Transport)

**Responsible Director: Name and Job Title – Chris Starkie Director of Growth and Investment**

**Is this a Key Decision? Yes /**

**If this is a Key Decision, date added to the Forward Plan of Key Decisions: March 2024**

## **Executive Summary**

National Grid have published a statutory consultation on their proposed Norwich to Tilbury electricity transmission project. The project comprises 184 km 400kV overhead power-line between Norwich Main and Tilbury in Essex. Approximately 30km of the transmission line sits within Norfolk with the potential for a 2 km section of undergrounding across the River Waveney to the West of Diss. The Project will be taken forward under the 2008 Planning Act as a Nationally Significant Infrastructure Project (NSIP) and will be determined Secretary of State for Energy Security and Net Zero. The County Council has previously responded to National Grid on two non-statutory consultations in June 2022 and September 2023; and sought an offshore alternative; or significant undergrounding if an onshore route was to be taken forward.

While there have been some improvements to the proposed route since the previous consultation, there are strategic concerns that the findings of a recent Study (March 2024) undertaken by the Electricity Systems Operator (ESO) relating to a series of alternative transmission options across East Anglia have not been adequately considered by National Grid. There are also concerns regarding the timing of the proposal in light of Independent Review commissioned by Norfolk, Suffolk and Essex County Councils suggesting that delivery is not needed until 2035 rather than 2030 as indicated by National Grid. There are also a number of detailed technical issues

set out in the Report (Appendix 3) which will need addressing before the Project is taken forward.

## **Introduction from Cabinet Member**

The County Council continues to recognise the need to add capacity to the existing electricity transmission network and understands that the project would assist in meeting the UK's energy ambition of connecting 50GW of offshore wind by 2030; and meeting the Government's net zero target by 2050. Nevertheless there are significant concerns that National Grid have not sufficiently addressed the alternative transmission options set out in the recent ESO Study nor effectively addressed the Independent Report Commissioned by the three County Councils.

The County Council's position remains as set out to previous consultation rounds and supports in principle an offshore option; or where this proves undeliverable then support should be given towards an onshore underground option.

Notwithstanding these concerns, if an onshore solution is the only "practical" option, then there needs to be:

- (a) further undergrounding along the route, particularly in the Diss area, where a recent Landscape Assessment Study commissioned by Norfolk and Suffolk County Councils has identified the importance of the River Waveney and quality of the local landscape; and
- (b) further consideration made by National Grid for delivering power to Norfolk to support planned housing and employment growth; and National Grid should contribute towards funding Norfolk's Energy Plan; and
- (c) suitable compensation arrangements for those residents and business affected by this proposal.

Given the scale of the proposal; the potential alternative options; and the questions around the timing when the upgrades are needed, an objection to the current Project is recommended. National Grid should pause their current plans and consider alternative options in consultation with the ESO; the Department for Energy Security and Net Zero; and local stakeholders.

## **Recommendations:**

The Committee agree to:

- 1. Raising an objection to the current proposal in light of the recent ESO Study (March 2024) and the alternative transmission options outlined in that Study;**
- 2. Asking National Grid to "pause" their current proposal and consider the alternative options with the ESO; Department for Energy Security and Net Zero; and local stakeholders;**
- 3. Supporting in principle either: an offshore option; or if this is proved undeliverable then an onshore option which is undergrounded;**



4. **In the event of an onshore option being taken forward, National Grid should commit to delivering wider benefits and opportunities to provide power to meet the needs of existing and planned growth in Norfolk; and contribute towards funding an Energy Plan for the County;**
5. **Welcome National Grid's proposal to underground part of the route to the west of Diss (Waveney Valley Alternative), but would like to see this underground area expanded significantly; and**
6. **Endorse the comments set out in this Report and accompanying Appendices to be sent to National Grid and the Department of Energy Security and Net Zero.**

## **1. Background and Purpose**

1.1 The purpose of this Report is to assess the consultation by National Grid for their Norwich to Tilbury project; and to agree the County Council's response. This is statutory consultation under Section 42 of the Planning Act 2008. The project broadly comprises a new 400kV overhead power line between Norwich Main and Tilbury substation in Essex. Members will recall that this committee responded to the Non-statutory consultation in September last year ([CMIS > Calendar of Meetings](#)) and urged National Grid and the Department for Energy Security and Net Zero (DESNZ) to consider:

- Further investigation into the offshore option – involving an offshore transmission network capable of delivering power direct from source to where it is most needed;
- Under-grounding option – in the event that the offshore solution is not deliverable / feasible within the timescales required; every effort must be made to bury the proposed cables; and
- Upgrading where possible the existing over-head power lines to increase capacity. It is understood, however, that National Grid have already started upgrading the existing overhead line.

1.2 This Committee also sought reassurance from National Grid that in the event of an onshore solution being deemed necessary, then there needs to be accompanying investment in the transmission network in Norfolk to deliver benefits of green energy for the County. In addition the Committee asked National Grid to consider route realignment and undergrounding around Diss and the Waveney Valley.

### **Nationally Significant Infrastructure Projects**

1.3 Given the scale of the project it will be taken forward as a Nationally Significant Infrastructure Project (NSIP) under the 2008 Planning Act and will be determined by the Secretary of State (SoS) for Energy Security and Net Zero. This is a statutory consultation by National Grid under Section 42 of the above Act. It is important to note that the County Council as a statutory

consultee will also have an opportunity to formally comment and make relevant representations on the submitted Development Consent Order (DCO) application (under Section 56 of the above Act), which is expected in 2025.

- 1.4 The above consultation rounds will be followed by a six-month Public Examination period led by the Examining Authority (ExA) appointed by the Planning Inspectorate (PINS). During this period the County Council will have an opportunity to comment and submit its Local Impact Report (LIR). There will also be opportunities to submit Statements of Common Ground (SoCG) with the applicant. It is likely that once National Grid have submitted their DCO, it will take a minimum of 18 months before a final decision is made by the Secretary of State.

### **Context and National Policy**

- 1.5 This project is coming forward as part of National Grid's: "the Great Grid Upgrade - making our electricity fit for the future"; and includes two other projects in Norfolk being taken forward under separate Development Consent Order (DCO) applications by National Grid:
- (a) Grimsby (Lincolnshire) to Walpole (West Norfolk) (**G2W**) – proposed new 400kV overhead line and new Substations (one proposed in Walpole); and
  - (b) East Green Links 3 and 4 (**EGL3&4**) – New subsea High Voltage Direct Current (HVDC) from Scotland and two convertor stations proposed in Walpole area
- 1.6 **National Policy Statement (NPSs)** – since commenting on the previous round of consultations, the Government has published a series of updated NPSs on Energy, which came into force in January this year. The key NPSs in relation to this project are: EN-1 (Overarching National Policy Statement for Energy); and EN-5 (National Policy Statement for electricity network Infrastructure).
- 1.7 **The Electricity Systems Operator (ESO)** published in March 2024 its East Anglia Network Study. The ESO role is to operate the electricity transmission system and work in partnership with Government, the energy regulator (Ofgem), industry and consumers to accelerate the transition away from fossil fuels into new energy technologies. They are independent of National Grid and other transmission owners (e.g. UKPN).
- 1.8 The ESO Study has considered a number of options on how to deliver the transmission reinforcement needed across East Anglia; and explored whether there are better ways to connect offshore wind in Norfolk; Suffolk; and Essex. The Study is referred to more detail below.

## **County Council's Climate Strategy**

1.9 The County Council's Climate Strategy (2023) recognises that the existing energy grid and distribution infrastructure requires considerable investment to adapt to future energy demands and emerging technologies. It indicates that "Investment to improve the network infrastructure is therefore fundamental to meeting decarbonisation aims as a county, and supporting the community itself as it transitions to an electrified future."

1.10 The Strategy also recognises that: "...there are pressures for new onshore transmission infrastructure associated with the offshore wind energy sector making landfall and grid connection in Norfolk. Consideration of alternatives to new overhead transmission lines needs to be taken forward for dealing with offshore wind energy, such as an offshore transmission network; and/or opportunities for burying new transmission lines to reduce visual impacts across the county".

### **Full Council Motion 7 May 2024**

1.11 At Full Council on 7 May 2024, the County Council agreed a Motion relating to the above Norwich to Tilbury proposal and this is set out in the Appendix 1 to this report

## **2. Proposal and Overview**

2.1 The Project broadly comprises:

- Building a new 400 kV overhead power line between Norwich and Tilbury (Essex) some 184 km– which would involve a 30 km overhead line and pylons (approximately 89 towers) in Norfolk (see Maps 1 – 6 in Appendix 2);
- Work at existing substations at Norwich Main; Bramford (Suffolk); and Tilbury (Thurrock, Essex); and
- A new substation in Tendring (Essex).

2.2 The key differences compared to the previous consultation (Summer 2023) are:

- The potential for undergrounding (2km) of part of the route to the west of Diss under the River Waveney;
- A series of alignment changes, including at:
  - (a) Norwich Main - to avoid a battery storage facility;
  - (b) Between Swainsthorpe and Mulbarton – to avoid a solar farm and archaeological site; and
  - (c) Aslacton – to reduce effects on woodland.

2.3 The project will also comprise other ancillary works required to facilitate construction and operation; and will include: (a) temporary work compounds, (b) a temporary haul road, (c) laydown areas, (d) scaffolding, (d) attenuation

ponds etc; and (e) land required for mitigation/compensation purposes and/or enhanced environment e.g. Biodiversity Net Gain.

- 2.4 The proposed overhead power lines will be supported by steel lattice pylons approximately 50m in height with typical intervals of 330m subject to constraints. The proposed alignment of the overhead lines is shown in Appendix 2 (See Maps 1 - 6). It is understood that the works required at Norwich Substation will be subject to a separate planning application submitted under the Town and Country Planning Act (TCPA) and will be determined by the Local Planning Authority (South Norfolk District Council). However, the DCO Application will seek consent for works at Norwich substation in the event that the TCPA application is delayed.
- 2.5 The need for the project arises from additional demands placed on the network from the connection of offshore wind farms and other proposed energy projects such as the recently consented Sizewell C. The project would assist in:
- Meeting the Government's energy ambition, as set out in the British Energy Security Strategy, of delivering up to 50 GW of offshore wind by 2030;
  - Meeting the Government's objectives of Net Zero by 2050; and
  - Decarbonising the energy transmission system.

### **3. Impact of the Proposal – Assessment and Strategic Comments**

- 3.1 Set out below are the proposed **strategic comments** to be forwarded to National Grid and the Department for Energy Security and Net Zero. Detailed technical comments are set out in the Appendix 3 and are made on a without prejudice basis to the overarching strategic comments.

#### **(a) Overarching Strategic Comments**

- 3.2 The need for upgrading the electricity transmission network at both the national and local level is recognised and this proposal would assist in meeting the Government's objectives on net zero and delivering offshore wind power. However, since previously commenting on the earlier consultation rounds by National Grid there has been the publications of two new Reports considering alternative electricity transmission options:
- Firstly - An Independent Review of the Strategic Options undertaken by Hiorns Smart Energy Networks (September 2023); and
  - Secondly - The ESO East Anglia Network Study (March 2024).
- 3.3 The Hiorns' Report commissioned by Norfolk, Suffolk and Essex County Councils concluded that while there is a demonstrable need for additional capacity to the existing network arising from new offshore wind generation and low carbon energy generation in the region (Sizewell C), it:

- (a) Does not support the current delivery timetable of 2030 outlined by National Grid; and instead suggests additional capacity would not be needed until 2035+; and
- (b) Suggests that the costs of the offshore alternative/s have been over-estimated by National Grid.

The Report does, however, conclude that the most economical option at present for meeting the need for future transmission capacity is onshore overhead lines and pylons.

- 3.4 The ESO published its East Anglia Network Study in March 2024 and considered a number of different electricity network configuration options for transferring power across or around the region. The Study looked at 10 options ranging from:
- Predominantly offshore;
  - Onshore Overhead Lines;
  - Onshore HVDC buried cables; and
  - Hybrid onshore and offshore

The County Council's position remains as set out to previous consultation rounds and supports in principle an offshore option; or where this proves undeliverable then support should be given towards an onshore underground option.

- 3.5 National Grid have considered both these studies and concluded that their proposal is the most efficient and economical; and can be delivered by 2030. However, given the scale of the proposal; the potential alternative options; and the questions around the timing when the upgrades are needed, National Grid should pause their current proposal and consider alternative options in consultation with the ESO and the Department for Energy Security and Net Zero.

**It is recommended that an objection is raised to the current project.**

- 3.6 The remaining strategic comments below relating to the onshore project are made on a without prejudice basis to the above comments:

#### **(b) Delivering Benefits and Compensation for Norfolk - Comments**

- 3.7 The County Council had previously sought assurances from National Grid that in the event of an onshore option being taken forward there needed to be demonstrable benefits for Norfolk in terms of providing power to communities and business to support planned growth. As currently set out, the Project would see energy passing through the County with none of the energy being used in Norfolk.
- 3.8 As such the County Council's previous comments should be maintained and National Grid should engage with both Norfolk County Council and UK Power

Networks as part of the above project to consider what opportunities there are to provide power to Norfolk; and what additional infrastructure may be needed to secure such benefits.

It is felt that this should be undertaken in conjunction with the County Council's preparation of an Energy Plan; and National Grid should contribute towards the cost of such a Plan, particularly given that other major National Grid Projects are coming forward elsewhere in the County.

- 3.9 In addition National Grid will need to address compensation for those residents and businesses adversely affected by the proposed project either during or after construction. It is understood that Government is still considering the wider compensation and community benefits arrangement needed to address the upgrading of the transmission network. With regard to the potential impact on local Airfields; and any potential safety issues arising must be a matter for the Civil Aviation Authority and the respective operators. The County Council would expect all safety considerations to have been taken into account by National Grid in consultation with the CAA.

### **(c) Minimising the Impact on Diss and the Waveney Valley - Comments**

- 3.10 Since the previous consultation round (2023) when the County Council sought the realignment and/or undergrounding of the overhead line across the River Waveney, National Grid are now consulting on a 2 km section of undergrounding across the River Waveney to the west of Diss (see Map 6 ) – referred to as the Waveney Valley Alternative.
- 3.11 The County Council along with Suffolk County Council have commissioned a Landscape Assessment Study of the Waveney Valley (2023). The Study recognises that while the area sits outside any national designations, it nevertheless demonstrates many of special qualities in terms of, *for example*:
- Presence of medieval churches; windmills and watermills;
  - Unspoilt rural tranquillity – creating a visually appealing landscape; and
  - Exhibits a particular uniqueness such as the wooded upper reaches west of Diss.
- 3.12 It concludes that the Waveney Valley expresses many of the special qualities of a “valued landscape”. This supports the County Council's previous comments, which recognised the landscape importance of the area; as well as an area of public recreation; and having a major visitor attraction at Bressingham Steam Museum and Gardens.
- 3.13 While the County Council welcomes the commitment by National Grid to underground across the Waveney Valley, the length of undergrounding (just 2km) should be extended along the western and northern edge of Diss by around 4 – 6 km to avoid impact on the local landscape and on local

communities in both Diss, Roydon and Bressingham. This would involve undergrounding pylons no. 75 – 90 (see Maps 5 and 6). The Landscape Assessment work carried out for Norfolk and Suffolk County Councils supports protecting this “valued landscape” and all its associated qualities.

- 3.14 Extended undergrounding in this area would be consistent with updated advice contained in National Policy Statement EN-5 covering Electricity Networks Infrastructure, which accepts that undergrounding may be required outside designated area. Further landscape and environmental comments are set out in Appendix 3 and indicate specific areas (pylons) where undergrounding should take place to avoid impact on: nature conservation areas; registered parks and gardens; historic buildings; and ancient woodland.

## **4. Evidence and Reasons for Decision**

- 4.1 Responding to this statutory consultation as recommended will enable the County Council’s strategic and technical comments on the proposed Norwich to Tilbury project to be considered by National Grid before they formally submit their DCO application in Spring 2025. The County Council will have the opportunity to respond and make relevant representations when National Grid formally submit their DCO application. The above comments alongside any further representations made by the County Council will ultimately feed into a Public Examination overseen by the Examining Authority (ExA) appointed by the Planning Inspectorate. The final decision on this proposal will be made by the Secretary of State following recommendation from the ExA.
- 4.2 The County Council’s engagement now in the process will help to bring forward the best scheme supporting the County Council’s clean growth ambitions and Climate Strategy in line with the Government’s net zero targets.

## **5. Alternative Options**

- 5.1 The County Council could choose not to respond to this statutory consultation, but this would not enable the County Council’s strategic and technical comments on National Grid’s project to be considered and taken into account in the decision-making process

## **6. Financial Implications**

- 6.1 Officers have engaged with the applicant at the technical scoping stage; attending steering group and topic-based meetings and provided technical advice and information in respect of the County Council’s statutory responsibilities. The County Council is in discussion with the applicant with regard to the preparation of a Planning Performance Agreement (PPA), which would allow for the cost recovery of officer time spent on this project.

- 6.2 To date the County Council has been able to charge for officer time spent engaging with National Grid ahead of any formal PPA being signed. The applicant has provided assurances, through a letter of intent, that reasonable staff time will be paid for.

## **7. Resource Implications**

- 7.1 Staff:** Staff resources for dealing with this project is being met from existing resources; and funding from National Grid as set out above.
- 7.2 Property:**  
There are no immediate implications for the County Council as landowner.
- 7.3 IT: None identified.**

## **8. Other Implications**

### **8.1 Legal Implications:**

This is a response to a formal statutory consultation on a proposal by National Grid, which if progressed would be determined under the 2008 Planning Act by the Secretary State for Energy Security and Net Zero. While there are no legal implications at this stage to the County Council responding to this consultation, it's continuing involvement and discussion with National Grid will ensure the County Council's statutory roles and responsibilities are met.

### **8.2 Human Rights Implications: None identified.**

### **8.3 Equality Impact Assessment (EqIA) (this must be included):**

The Council's Planning functions are subject to equality impact assessments. A detailed equality impact assessment has not been carried out as this report is responding to a consultation, however, consideration has been given to equality issues. The recommended comments relate to the County Council's role as a statutory consultee. This report and the comments set out in the report aim to ensure that any new overhead lines will have minimal impact on communities, while supporting the County Council's own clean growth ambitions and Climate Strategy in line with the Government's Energy Security Strategy .

### **8.4 Data Protection Impact Assessments (DPIA): None identified.**

### **8.5 Health and Safety implications (where appropriate):** The wider Public Health implications of this proposal are set out in the Appendix 3 along with the County Council's detailed technical comments.

### **8.6 Sustainability implications (where appropriate):**



These are considered in the main text of the Report.

#### **8.7 Any Other Implications: None identified.**

### **9. Risk Implications / Assessment**

- 9.1 The County Council is a statutory consultee on any Nationally Significant Infrastructure Project within or adjacent to Norfolk; and the final decision will be determined by the Secretary of State. Following this statutory Section 42 consultation there will be further opportunity for the County Council to respond to this proposal at the formal 56 (submission stage) under Section 56 of the Planning Act 2008.
- 9.2 The County Council will also be invited to submit a Local Impact Report later in the DCO process setting out detailed comments on the proposal as it affects the County Council.

### **10. Select and Scrutiny Committee Comments and Local Member Comments**

- 10.1 Given the very tight timetable to respond to this statutory consultation, there has not been the opportunity to take this item through the Select Committee process. However, a high-level strategic assessment on this consultation was reported to Scrutiny Committee on 22 May where a number of issues / comments were raised and these are set out in Appendix 5.
- 10.2 Local Member Comments are set out in Appendix 4; and/ or will be reported orally at Committee.

### **11. Recommendations**

The Committee agree to:

- 1. Raising an objection to the current proposal in light of the recent ESO Study (March 2024) and the alternative transmission options outlined in that Study;**
- 2. Asking National Grid to “pause” their current proposal and consider the alternative options with the ESO; Department for Energy Security and Net Zero; and local stakeholders;**
- 3. Supporting in principle either: an offshore option; or if this is proved undeliverable then an onshore option which is undergrounded;**
- 4. In the event of an onshore option being taken forward, National Grid should commit to delivering wider benefits and opportunities to provide power to meet the needs of existing and planned growth in Norfolk; and contribute towards funding an Energy Plan for the County;**

5. Welcome National Grid's proposal to underground part of the route to the west of Diss (Waveney Valley Alternative), but would like to see this underground area expanded significantly; and
6. Endorse the comments set out in this Report and accompanying Appendices to be sent to National Grid and the Department of Energy Security and Net Zero.

## 12. Background Papers

- 12.1 Norwich to Tilbury – Preliminary Environmental Information Report (PEIR)  
National Grid web-page: [www.nationalgrid.com/norwich-to-tilbury](http://www.nationalgrid.com/norwich-to-tilbury)
- 12.2 National Grid Web-page on the overhaul of the electricity grid:  
<https://www.nationalgrid.com/the-great-grid-upgrade>
- 12.3 Planning and Highways Delegations Committee Report September 2023: [CMIS > Calendar of Meetings](#)
- 12.4 Grimsby to Walpole Grimsby to Walpole:  
<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/grimsby-to-walpole>:
- 12.5 East Green Links 3 and 4 : <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/eastern-green-link-3-and-4>.
- 12.6 Overarching National Policy Statement for Energy (EN-1);  
<https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>
- 12.7 National Policy Statement for Electricity networks infrastructure (EN-5):  
<https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5>
- 12.8 Electricity Systems Operator (ESO) East Anglia Network Study (March 2024):  
[East Anglia study | ESO \(nationalgrideso.com\)](http://East%20Anglia%20study%20|%20ESO%20(nationalgrideso.com))
- 12.9 British Energy Security Strategy:  
<https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-security-strategy>
- 12.10 Valued Landscape Assessment – Waveney Valley March 2024:  
<https://www.suffolk.gov.uk/council-and-democracy/council-news/waveney-valley-a-valued-landscape-according-to-new-study>

12.11 East Anglia Transmission Network Reinforcements – Hiorns Smart Energy  
Networks: [Norwich to Tilbury - Suffolk County Council](#)

**Officer Contact**

If you have any questions about matters contained within this paper, please get in touch with:

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## **Appendix 1**

### **Norwich to Tilbury Overhead Power Line Proposal – Statutory Consultation by National Grid**

#### **Full Council Motion - Agreed 7 May 2024**

National Grid have opened their statutory consultation concerning the plans for a line of giant pylons to transfer power from offshore windfarms to London, passing through Norfolk, Suffolk and Essex. Residents in the areas affected are outraged by the fact that despite many submissions being made in response to the earlier consultations, there is little evidence that the considerations put by residents, councils, heritage and nature organisations, the only improvements to the proposed route since the previous consultation in the summer of 2023 are:

- The proposed undergrounding (2km) of part of the route to the west of Diss under the River Waveney;
- A series of alignment changes, including at:
  - a) Norwich Main - to avoid a battery storage facility;
  - b) Between Swainsthorpe and Mulbarton – to avoid a solar farm and archaeological site; and
  - c) Aslacton – to reduce effects on woodland.

The County Council continues to recognise the need to add capacity to the existing electricity transmission network and understands that the project would assist in meeting the UK's energy ambition of connecting 50GW of offshore wind by 2030; and meeting the Government's ambitious net zero target by 2050. Nevertheless, there are significant concerns that National Grid have not sufficiently addressed the alternative transmission options set out in the recent Electricity Systems Operator (ESO) Study which include offshore options and undergrounding options.

This County Council will continue to work with our neighbouring County Councils, as evidenced by the Independent Energy Review and Landscape Assessment work, and will continue to favour:

- a) An Offshore alternative; or;
- b) Undergrounding the whole route where the feasibility of an offshore option is not deliverable;

This Council resolves to ask the Leader to write to National Grid asking to:

- a) reconsider the offshore option as the primary solution,
- b) in the alternative consider further undergrounding along the route, particularly in the Diss area, where a recent Landscape Assessment Study commissioned

by Norfolk and Suffolk County Councils has identified the importance of the River Waveney and quality of the local landscape; and

- c) consider delivering power to Norfolk to support planned housing and employment growth,
- d) consider suitable compensation for those residents and business affected by any proposals during and as a consequence of any construction.

# **Planning and Highway Delegations Committee**

## **Appendix 2**

### **Maps 1-6**

Map 1 – Norwich Main

Map 2 – Flordon Common

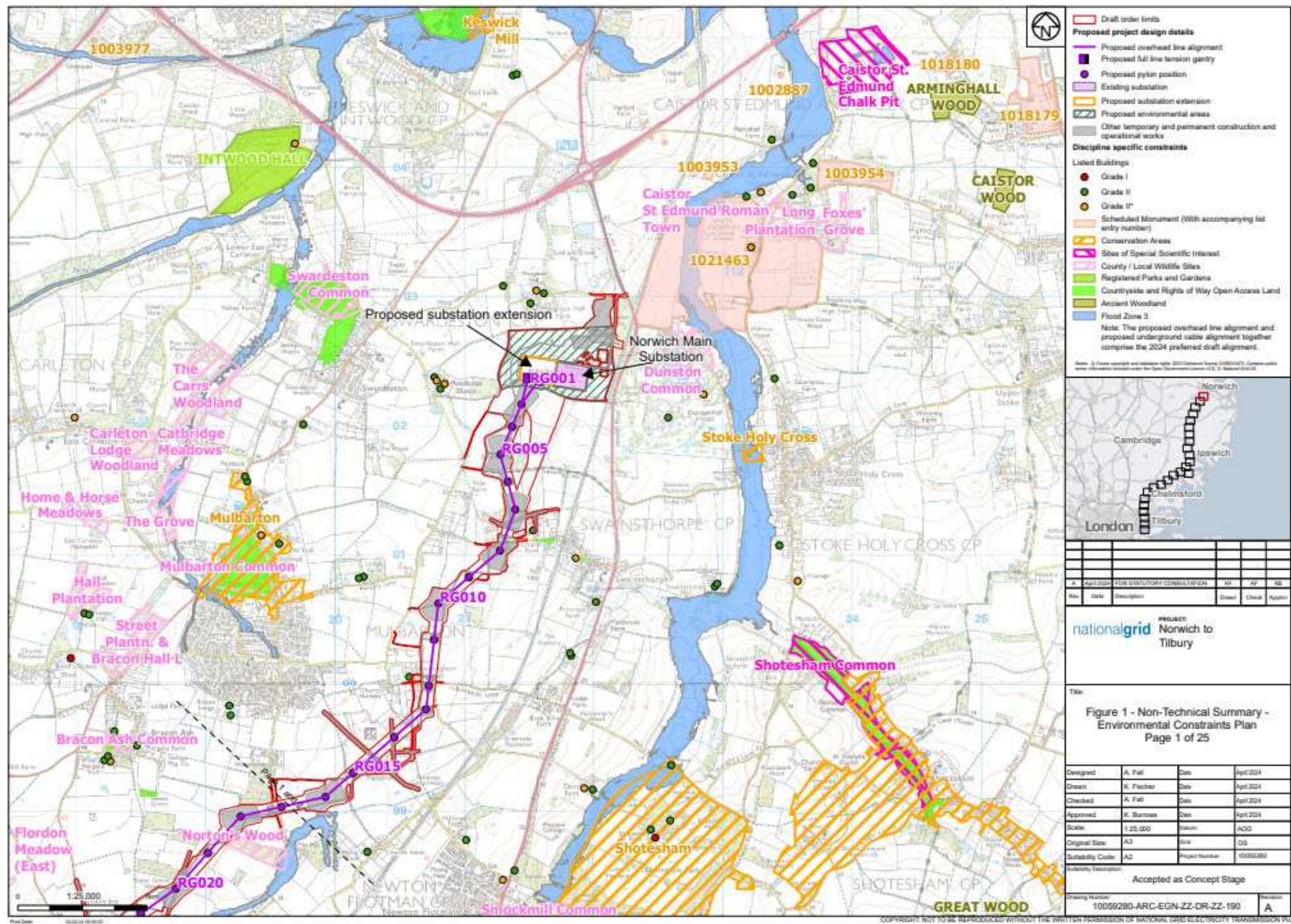
Map 3 – Bunwell Wood and Airstrip

Map 4 – Winfarthing

Map 5 – Diss OHL

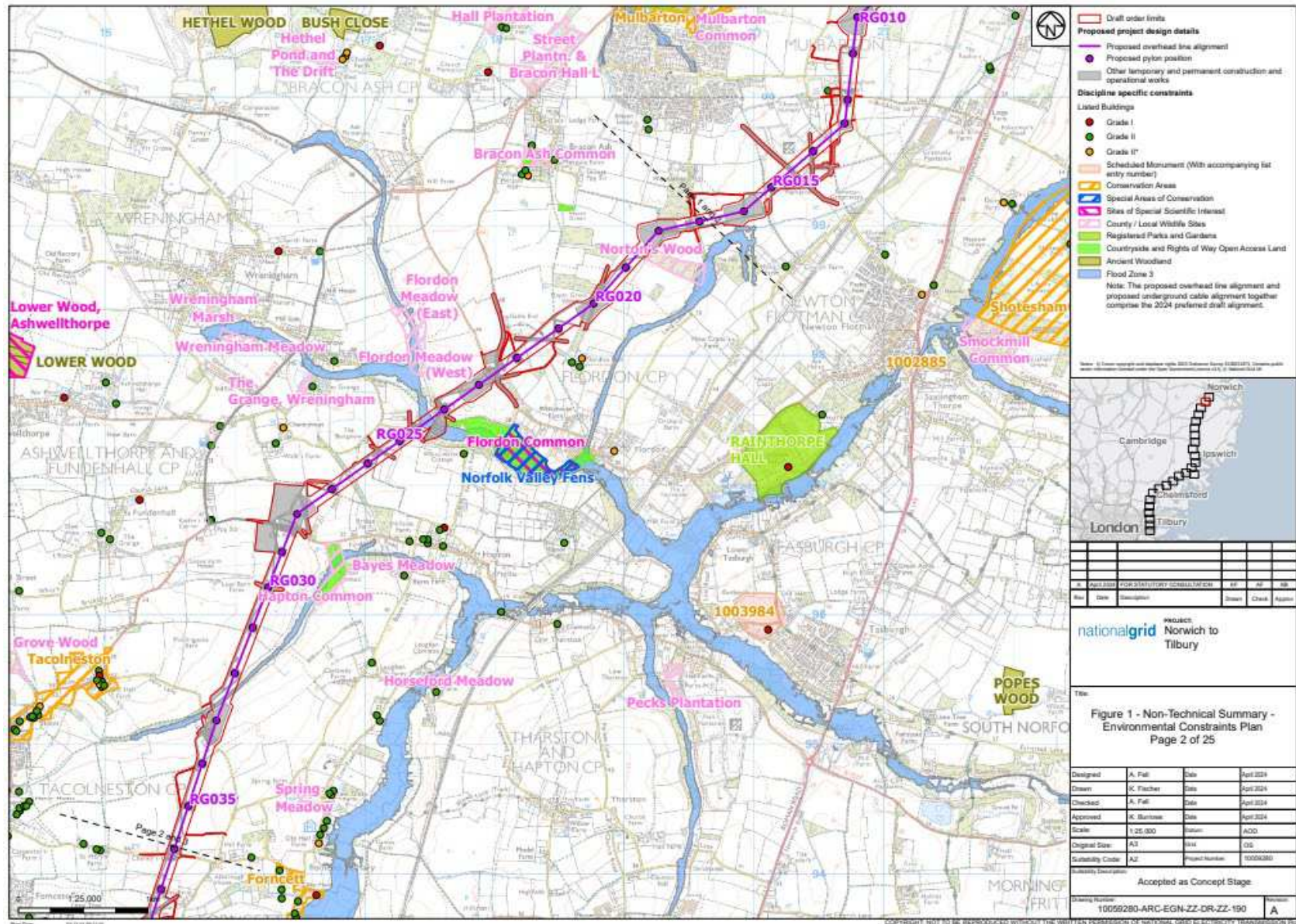
Map 6 – Diss Waveney Valley Alternative

Map 1 – Norwich Main



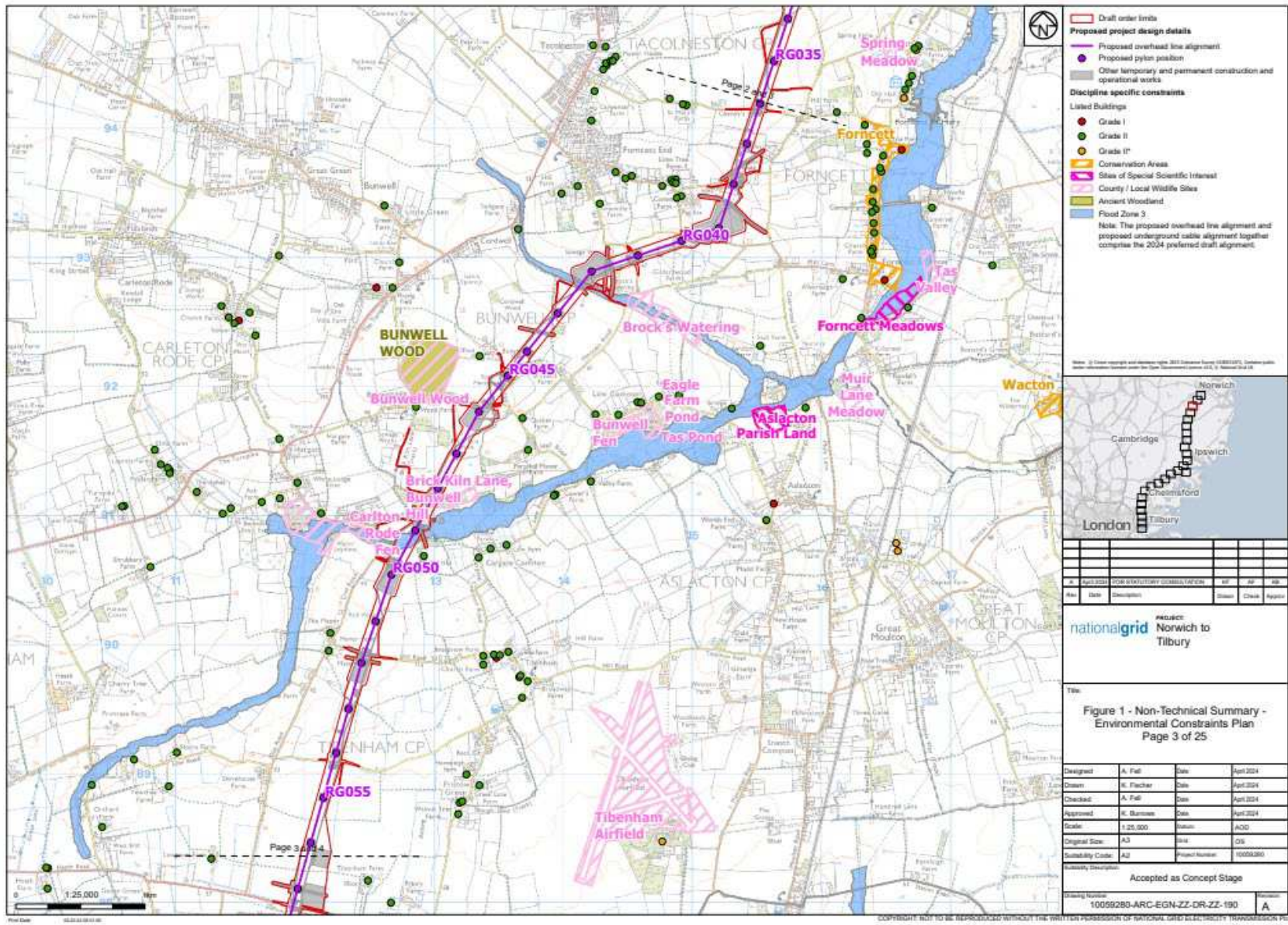


Map 2 - Flordon Common



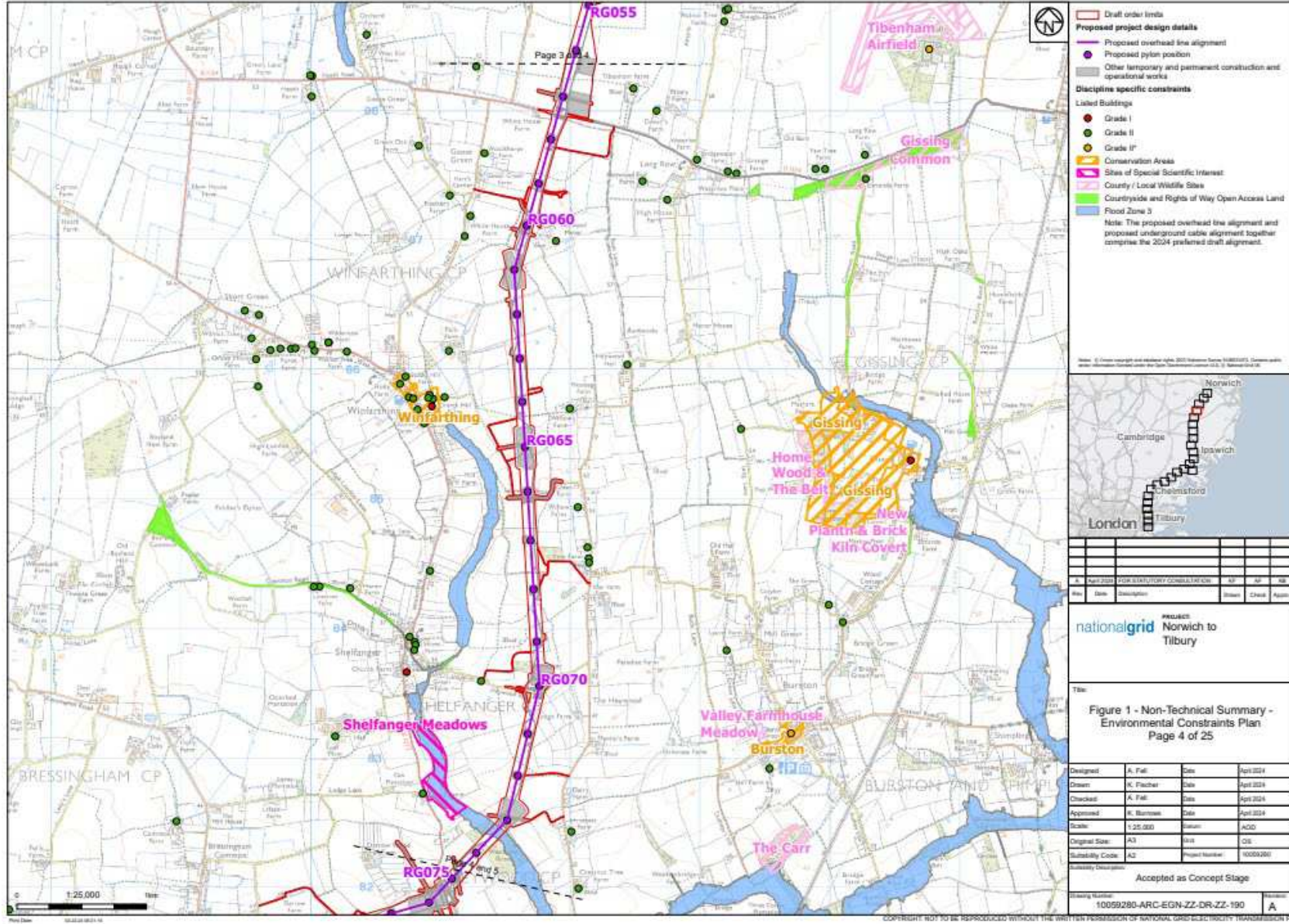
### Map 3 - Bunwell Wood and Tibenham Airfield





## Map 4 - Winfarthing





Rev	Date	Description	Drawn	Check	Appr
1	2024	Initial Design			
2	2024	Revised Design			
3	2024	Final Design			

**nationalgrid** PROJECT: Norwich to Tilbury

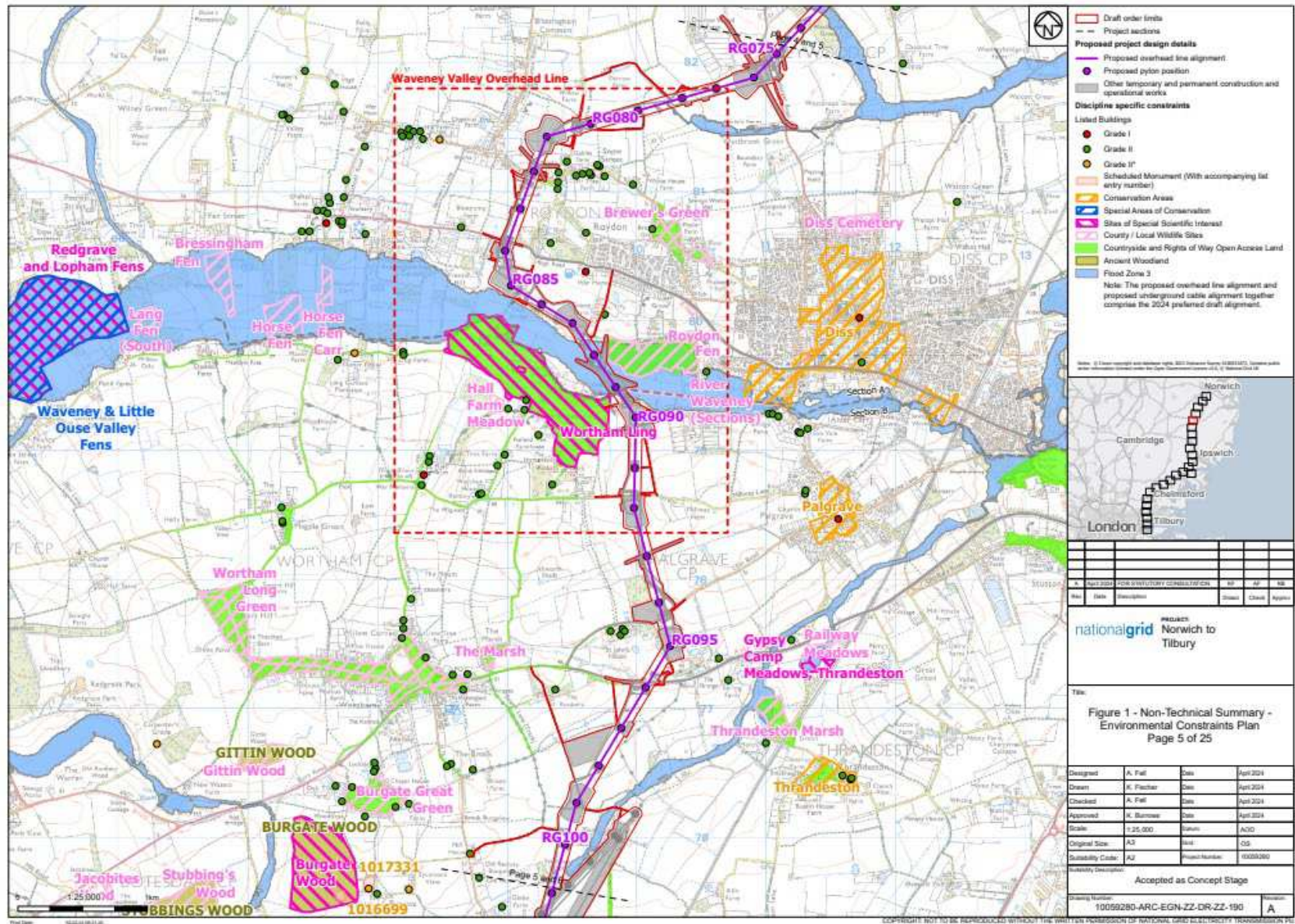
**Title:**  
Figure 1 - Non-Technical Summary - Environmental Constraints Plan  
Page 4 of 25

Designed	A. Felt	Date	April 2024
Drawn	K. Fischer	Date	April 2024
Checked	A. Felt	Date	April 2024
Approved	R. Burrows	Date	April 2024
Scale	1:25,000	Datum	AD0
Original Size	A3	Unit	OS
Subsidiary Code	A2	Project Number	10059280
Subsidiary Description	Accepted as Concept Stage		

Drawing Number: 10059280-ARC-EGN-ZZ-DR-ZZ-190  
Revision: A

Map 5 – Diss (Waveney Valley overhead line)







Map 6 – Diss (Waveney valley Alternative)



# Planning and Highway Delegations Committee

## Appendix 3

### Technical Comments on the Section 42 Consultation – June 2024

#### 1. Introduction

- 1.1 The technical comments below are made on a without prejudice basis to the wider strategic comments set out in the main report and the County Council reserves the right to make further comments at the: (a) formal submission stage of the Development Consent Order (DCO); and (b) Local Impact Report stage.
- 1.2 It should be noted that County Council officers will continue to sit on the various thematic technical group set up by National in order to work through the issues below ahead of the submission of the DCO.

#### 2. Strategic Overview - Comments

- 2.1 **De-carbonisation of the grid** - The County Council continues to recognise the need for increasing capacity to the existing electricity transmission networks across the Eastern Region in order to cope with the additional electricity being generated from offshore windfarms. However, it is also recognised from the March 2024 ESO Study that there are a number of alternative options for delivering increased capacity and these need fully assessing by National Grid in consultation / discussion with the ESO; DESNZ; and local stakeholders.
- 2.2 **Compensation** – National Grid will need to consider appropriate compensation packages for those homes and businesses directly affected by both the construction works, and any long terms impacts. The route of any power-lines will need to avoid any direct impacts on business. National Grid will be aware that their preferred route corridor passes close to Tibenham Airfield; and Priory Farm Airstrip and will need to ensure that the siting of any power lines does not impact on the commercial operation of these airfields. The County Council recognises aviation safety is a matter for the Civil Aviation Authority (CAA) to comment on as necessary.
- 2.3 **Community Benefits** – National Grid will need to set out clearly from the outset:
  - (a) how local communities impacted by the onshore construction (e.g. Cable Route and Substation) can have such impacts mitigated; and
  - (b) the need for a “local community fund” to assist the wider community affected by the proposal.

### **3. Natural Environment and Archaeology - Comments**

#### **(1) Over-arching Environmental Comments**

3.1 The above proposal will need to follow the advice and guidance set out in recently updated (January 2024) National Policy Statement (NPS). The key NPSs in relation to this project are: EN-1 (Overarching National Policy Statement for Energy); and EN-5 (National Policy Statement for electricity network Infrastructure. National Grid also will need to satisfy:

(a) the Guidelines for routing of new overhead lines introduced by Lord Holford (i.e. the Holford Rules -

<https://www.nationalgrid.com/sites/default/files/documents/13795-The%20Holford%20Rules.pdf> ); and

(b) The Horlock Rules

<https://www.nationalgrid.com/sites/default/files/documents/13795-The%20Holford%20Rules.pdf> - guidelines for the design and siting of Sub-stations.

#### **(2) Arboriculture**

3.2 The comments below are based on a desktop exercise and are in addition to the response from Ecology and Landscape and relate to the potential impact on trees (not just designated woodland masses) suitable for retention and the need for this to be assessed and conflict designed out at the earliest possible opportunity.

3.3 It is noted that the route avoids significant areas of woodland which has helped to limit arboriculture and woodland impacts. The use of tree and hedge data - in addition to considering woodlands with designations, National Grid should consider publicly available information, such as the Norfolk Tree and Hedge Map ( [Norfolk Trees and Hedges \(arcgis.com\)](https://www.norfolk.gov.uk/norfolk-trees-and-hedges) ) which are used to help inform design before the detailed design stage.

3.4 It is likely that direct losses due to the location of the supporting pylons will be minor compared to the impact that the temporary and permanent access routes will have on trees and hedges. The full extent of the arboriculture impacts of these should be included with a BS 5837 (2012) – Trees in Relation to Design, Demolition and Construction Assessment. This Assessment should include a tree constraints plan to inform design choices at an early stage and enable arboriculture impacts to be avoided and designed out where possible.

3.5 While the removal and cutting back of some low-quality trees and hedges may be considered a transitory impact (with replanting providing the required long-term landscape mitigation), the loss of important hedges (as defined

under The Hedgerow Regulations 1997) or veteran trees is considered a permanent loss and one that it is not possible to fully mitigate against.

- 3.6 The proposed undergrounding option through the Waveney Valley will result in a higher number of mature trees and hedges removed compared to the overhead option. The majority of these trees and hedges are on centuries old field boundaries. The contemporary tree and hedge map of Norfolk ( [Norfolk Trees and Hedges \(arcgis.com\)](https://arcgis.com) ) clearly shows many trees that are growing on in the same location as those marked on the 1<sup>st</sup> edition mapping of the 1880's. These trees should be checked for ancient or veteran tree features and for the presence of any protected species (e.g. bats). Any disturbance to protected species must be avoided or appropriate licences gained. While the removal and re-planting of trees can be seen as a transitory non-permanent change the loss of ancient trees or important hedgerows is considered irreplaceable and must be avoided unless there is no alternative option.
- 3.7 As such the preference, from simply an arboriculture perspective, is for overgrounding of this section. It is appreciated that there may be alternative landscape considerations that would favour the underground option and these need to be considered as part of a balanced approach to impacts.
- 3.8 Any mitigation planting should focus on restoring and enhancing field boundary features that have been lost since the 1<sup>st</sup> edition OS mapping and where the landscape and ecological connectivity will be enhanced.

### **(3) Ecology**

#### **(a) Biodiversity Net Gain (BNG)**

- 3.9 There needs to be clarity and further discussion with National Grid around the level of potential off-site BNG and how this will align with the County Council's Local Nature Recovery Strategy. It is understood that Habitat Assessments have been undertaken using aerial and onsite surveys and these will be needed to help inform the level and type of offsite BNG required. It may be difficult for National Grid to assess the condition of the site using aerial surveys; and as such the County Council would welcome more onsite surveys. A key point is to identify irreparable habitat, which would require bespoke mitigation as an aside from the BNG process.

#### **(b) Statutory and Non-Statutory Sites**

- 3.10 These include :
- Waveney Valley Alternative;
  - Wortham Ling SSSI – peat area;
  - Roydon Fen County Wildlife Site and local Nature Reserve; and other
  - Priority Habitats.

These areas will require specific mitigation measures dependant on whether the line is to be undergrounded here

(c) Protected Species

3.11 The following will need to be taken into account:

**Great Crested Newts (GCN)**- Natural England has agreed to District Level Licensing for Great Crested Newts.

- **Bats** - The Static locations are not clear on the maps provided in the PEIR. National Grid will need to demonstrate that the conservation status of the bats (particularly the Barbastelle bats, which are protected by environmental laws) will not be negatively affected by their project.
- 
- While it is understood that the above matters and the issuing of any licence is the responsibility of Natural England it is felt that the Project and supporting information needs to be clear on any potential impacts on protected species; and what potential mitigation measures will be put in place where needed.

3.12 A number of reports are due this year (2024) for the latest species information. These updated surveys will need to be described in the Environmental Statement and will need to inform the CoCP (Code of Construction Practice) and LEMP (Landscape and Ecology Management Plan/s). With particular focus on species that require license both European (GCN, Bats etc) and domestic (Badgers). The applicant needs to be confident that Natural England will accept the license applications.

3.13 Overall there needs to be further discussion with the applicant on a number of the detailed matters raised above.

**(4) Landscape**

3.14 Undergrounding of the entire route could be a way to minimise landscape and visual impacts that are associated with overhead powerlines and pylons. However, this is subject to the construction work and associated above ground infrastructure not having a more significant adverse impact;

3.15 Currently the PIER states for undergrounding there is the requirement to clear a 120m wide swathe of vegetation which following construction can be re-planted with hedgerows, but not trees. For overgrounding cables a 40m swathe of vegetation will need to be cleared, with the potential additional removal/management of vegetation within 100m. It is noted that haul roads and construction compounds, while temporary, will require extensive vegetation clearance and have landscape and visual impacts.

3.16 It would be beneficial to have a full assessment undertaken as to what the full impacts would be of undergrounding the entire route and whether the 120m swathe would be required for the entirety, and what conflicts this would



cause. Additionally detail on whether the haul road requirements would be the same and what above ground infrastructure would be needed for entire undergrounding. If undergrounding the entire route is not possible, or through assessment shows to have more significant adverse impacts, consideration should be given to locations that could be undergrounded, similar to the Waveney Valley Alternative option. These locations, include but not restricted to:

- (a) Flordon Common / Norfolk Valley Fens (SSSIs/SACs) – to avoid impact on these areas there is a need to underground proposed pylons no. 18 – 30 inclusive (see Map 2);
- (b) Registered Parks and Gardens (e.g. Rainthorpe Hall) - to avoid impact on these areas there is a need to underground proposed pylons no. 18 – 30 inclusive (see Map 2);
- (c) Ancient Woodland – Bunwell Wood - to avoid impact on these areas there is a need to underground proposed pylons no. 43 – 48 inclusive (see Map 3);
- (d) Tibenham Airfield (Historic Site) - to avoid impact on this site there is a need to underground proposed pylons no. 50 – 60 inclusive (see Map 3). It should be noted that these comments do not relate to aviation safety which is a matter for the Civil Aviation Authority (CAA) to address;

(e) Diss and Waveney Valley

- 3.17 Currently the proposals include approximately 2km of underground cabling through the Waveney Valley. The County Council is broadly supportive of this proposal due to the sensitivity of this area both due to the landscape, and the visual impacts on residents living in Diss. However, with open cut trenching the impacts are far greater than would be present with trenchless installation. As noted in paragraph 13.8.10 of the PIER the Waveney Valley Alternative (the option to underground the cables) could have a greater direct effect on the fabric of the landscape and tranquillity during construction, although a lot of this is temporary and reversible. It is noted that at 2km in length, the undergrounding here will not eliminate all impacts in this area and that an increased section of undergrounding which extends 4-6km around the west and north of Diss has the potential to avoid some of these impacts by removing the overhead powerlines in the vicinity of the communities of Diss, Roydon and Bressingham, but also removing some of the visual impacts of the pylons coming into the area. Again recognising that the undergrounding itself will still have landscape impacts through both the construction and operational phases, including, but not limited to open cut trenching, removal of trees/other landscape features and above ground infrastructure (Compound Sealing Ends) needed to convert from overhead powerlines to underground lines. It is felt that further assessment would be needed to ascertain/test the underground option.

Based on the above comments there is a need to underground proposed pylons no. 75 – 90 (see Maps 5 and 6) in order to avoid impacts on:

- The historic setting of Diss (Conservation Area),
- Listed / Historic Buildings in the area e.g. St Remigius Church, Roydon;
- County Wildlife Sites (e.g. Royden Fen);
- Bressingham Village; and the Steam Museum and Gardens; and
- Roydon Village.

3.18 The current assessment assumes traditional pylons. Alternative pylon design (T-Pylons) could help minimise visual impacts. The Design Development Report states that the assumption of traditional lattice pylons has been used but says this is still open to consideration. Appendix C of that report lays out the decision-making process for selecting lattice pylons. There are positive and negatives to both and at this stage the County Council does not consider these alternative designs (T-Pylons) should be ruled out entirely as they do present a lower structure which could help minimise landscape and visual impacts in some areas. It's appreciated that the T-Pylon structure does have a greater mass, however colour choice, especially if graduated (e.g. green base to pale grey top) can help to minimise the visual appearance. It appears that switching between lattice and T-Pylons is possible, so it may be that through Landscape Assessments, decisions could be made to some sections which may benefit from the use of T-Pylons. Noting that in a similar fashion to undergrounding, there are other considerations. For example whilst the T-Pylons could have less visual impacts if located/coloured suitably, there may be permanent access routes and level work areas required to be left in situ and more vegetation removal required due to the lower height. Further landscape assessment of this should be undertaken.

3.19 Broadly speaking the methodology utilised so far to undertake the assessments is suitable and follows industry standard guidance. Similarly for the further assessment with the ES chapter, the County Council is broadly supportive of the proposed methodology.

3.20 Where impacts cannot be avoided, mitigation measures will need to be identified. While advanced planting and screening will not minimise all impacts, carefully planned incremental planting can be effective at minimising and softening the appearance of infrastructure in the landscape. Often layered planting starting some distance away can help to break up extensive views.

#### **(f) Archaeology**

3.21 Although elements of proposed overhead pylon scheme, for example the haul road and pylon working areas, would have considerable impact on below-ground archaeology undergrounding any sections of the scheme would



increase potential impacts on below-ground archaeological remains by several orders of magnitude. The archaeological consultants working for National Grid and National Grid themselves are aware of the potential increase in impacts on below-ground archaeology with attendant impacts on timetables and costs.

3.22 The proposed undergrounding of the section through the Waveney Valley will impact important and unique riverine peat deposits with high paleoenvironmental significance. The Historic Environment team regards the peat deposits of Norfolk as undesignated heritage assets in their own right. Highly detailed specialist work will be required to assess the significance of the peat deposits and understand potential impacts.

3.23 It is understood that the archaeological consultants working on behalf of National Grid have already obtained an Historic Environment Record search to aid in the siting of any new pylon towers in order to avoid impacts on undesignated heritage assets in the form of below-ground archaeology. The County Council understand that a non-intrusive Geophysical survey is underway on parts of the scheme.

3.24 As well as the haul road and pylon working areas consideration should be given to the placement of construction compounds, access tracks and the like as these can have more impact than pylon bases. Consideration should also be given to 'no-dig' construction methods for compounds, access tracks etc.

3.25 At this stage the Historic Environment team have not had the opportunity to assess the proposed alignment and location of pylons or any other elements of the scheme in detail. The County Council has had sight of the archaeological desk-based assessment completed as part of the EIA process. Detailed locational information has been provided on the project order limits, pylon locations, substation, overhead line alignment, underground cable alignment but not some other elements of the scheme such as haul roads. The Historic Environment team need to understand further the timetable for sharing of geophysical survey results before undertaking a detailed impact assessment of pylon locations and all other elements of the scheme. Regular cross county archaeology working group meetings are taking place with National Grid and their archaeological consultants

#### **(g) Public Rights of Way (PRoW)**

3.26 The PRoW team would reiterate previous comments and recommend that National Grid takes the following into account:

- Impacts during construction- If any Public Rights of Way need to be crossed or are impacted by the cable route during construction or require temporary closure of a PRow – the applicant would need to provide advance warning to the County Council; and
- Impacts during operation- If any Public Right of way will be impacted during the operation and servicing of the infrastructure, details need to be provided in advance and any proposed mitigation measures put in place.

The applicant needs to actively engage with the County Council to satisfactorily address the above matters.

## **4. Transport / Highways**

4.1 The Highway Authority has the following comments on the current proposal:

- 4.2 With regards to the A1066 and traffic coming from Thetford, Norfolk County Council have asked the applicant to explore this option as an alternative to their proposal of traffic coming through Diss and are currently waiting for their assessment and findings. It is Norfolk County Council's highways preference for all construction traffic to use the A1066 via Thetford and not Diss. The existing traffic volumes in Diss would mean the proposed amount of HGV's going through Diss would augment the existing traffic issues and the route on the A1066 from Thetford would have less traffic and a free-flowing route for HGV's.
- 4.3 The current timetable for the A140 Long Stratton bypass construction of April 2024 until late summer/autumn 2026, this shouldn't be an issue with your own timetable but should be submitted into TIA or outline CTMP in case any delays to its construction.
- 4.4 There needs to be clarity on abnormal loads - Will abnormal loads (i.e. cable drums) be shown in a separate assessment?
- 4.5 There is nothing relating to traffic volumes and until such time as the traffic volumes on each link are confirmed, the County Council is unable to provide any detailed comments in relation to traffic impacts along the links. Accordingly, this response is provided in general terms only. The fact that any particular point is not explicitly addressed within this response should not be taken as agreement with it. The County Council's view may change when the traffic data becomes available.
- 4.6 Non-Technical Summary - 5.12.3 – A1066 needs to be added as a strategic route network.
- 4.7 Design Development Report – 5.4.39 & 41 – Stutson Common Golf Course is incorrect; it is Stutson Common and Diss Golf Club separately.

4.8 Volume 3 – part 4 of 4 in the appendices – 16.4.1 – table A – 16.1.6 same as above.

4.9 Waveney Alternative Plan – sensitive receptors need to be shown on the A1066 route from Thetford.

4.10 Construction Access plans:

- Sheet 1 - Mangreen / A140 junction – they need to carry out widening works at the junction, not just verge clearance.
- Sheet 3 - Hethel Roundabout to be shown in shaded / hatching with a note saying start of works expected late 2024 / early 2025 and would it be best to close Wymondham Road except to construction traffic, as traffic can use Flordon Road.
- Sheet 8 – Route to be shown from A1066 Thetford / Low Road and not through Diss

4.11 Further Transport Assessment works needs to take into account the following:

**(a) Vehicles** – define the nature of the traffic likely to be generated. In addition for the largest vehicles proposed to use each access route(s) this must include: -

- minimum width (including unhindered horizontal space)
- vertical clearance
- axle weight restriction

**(b) Access & Access Route** – description of the route (including plans at an appropriate scale incorporating swept-path surveys). Assessment to include site inspection and details of contact with the appropriate Highway Authority (including the Highways Agency for Trunk Roads where applicable). In addition: -

- details of any staff/traffic movements/access routes;
- detailed plans of site access/es incorporating sightline provision
- confirmation of any weight restrictions applicable on the route together with details of contact with the relevant Bridge Engineer
- overhead/ underground equipment – details of liaison with statutory undertakers - listing statutory undertakers consulted together with a copy of their responses
- details of any road signs or other street furniture along each route that may need to be temporarily removed/relocated.

**(c) Impacts during construction** – are any special requirements needed and if so, provide details e.g.:-

- timing of construction works
- removal of parked vehicles along the route(s) – full details will need to be provided – including whether or not alternative parking arrangements are being

offered or bus services provided in lieu of potential loss of ability to use private cars

- removal and reinstatement of hedgerows – since these are usually in private ownership has contact been made with the owners. Has formal legal agreement been reached or are negotiations pending/ in progress
- identification of the highway boundary along the construction traffic route together with verification from the Highway Authority (scope to be agreed in advance)
- any modifications required to the alignment of the carriageway or verges/over-runs
- identification of sensitive features/receptors along the route
- confirmation of whether any of the verges along the route(s) are classified as SSSI or roadside Nature Reserve status. If so, detail any impact
- confirmation of any extraordinary maintenance agreement/s required by the Highway Authority

**(d) Cabling route/grid connection** – description of the route/s including plans at an appropriate scale, incorporating, for example:

- assessment to include site inspection and details of contact with the appropriate Highway Authority (including the Highways Agency for Trunk Roads where applicable)
- traffic details of grid connection enabling works

**(e) Impacts during operation**

- details of type and frequency of vehicle to be used to service the facility/structure(s) when in operation
- details of any long-term highway impact e.g. will trees and hedgerows need additional trimming to allow access for service vehicles
- assessment of any impact on adjacent/affected public rights of way e.g. horses and pedestrians

## **5. Minerals and Waste**

5.1 The County Council as Minerals and Waste Planning Authority has examined the PEIR and the relevant appendices. In particular, the Preliminary Mineral Resource Assessment (MRA) (Appendix 9.2).

Paragraph 9.2.14 of the MRA states that information on the Mineral Safeguarding Areas, for Norfolk, within the preferred corridor are outstanding. This is not the case; these were supplied to the preliminary stage of the project and have now also been resent to the project team.

Having examined the information within the PEIR and Appendix 9.2; the Mineral Planning Authority agrees with methodology used to determine mineral safeguarding issues. The conclusions of the Mineral Resource Assessment appropriately address these issues. The proposed infrastructure in Norfolk would consist of overhead powerlines and pylon towers (which have a relatively small footprint of around 10m x10m each), together with a substation.

It is considered that needless sterilisation of mineral resources does not occur, as the preferred corridor route only contains sparse isolated areas of safeguarded sand and gravel resources; and there is little coincidence of the built elements of the project with the resource.

## **6. Norfolk County Council – Public Health Impact**

### **Relevant background information to the review**

6.1 The UK Health Security Agency (formerly Public Health England ) published guidance on electric and magnetic fields: health effects of exposure in July 2013. This states that a number of studies:

*“...show a possible link between exposure to magnetic fields in the home (and/or living close to high voltage power lines) and a small excess in childhood leukaemia. It is estimated that 2 to 5 cases from the total of around 500 cases of childhood leukaemia per year in the UK could be attributable to magnetic fields. This number is based on the assumption that exposure has to be above a certain threshold before there could be a health effect. The overall evidence, however, is not strong enough to draw a firm conclusion that magnetic fields cause childhood leukaemia. Magnetic fields don't have sufficient energy to damage cells and thereby cause cancer. At present there is no clear biological explanation for the possible increase in childhood leukaemia from exposure to magnetic fields. The evidence that exposure to magnetic fields causes any other type of illness in children or adults is far weaker.*

As the National Grid proposal is considered a Nationally Significant Infrastructure Project the UK Health Security Agency will be a statutory consultee and are the national experts on the health impacts of such proposals.

Norfolk Public Health has reviewed information presented for Norfolk only (including the Waveney Valley alternative) and considered four chapters of the Preliminary Environmental Information Report which are relevant to the wider determinants of health of residents. These are:

- Chapter 10 Health and Wellbeing
- Chapter 15 Socioeconomics, Recreation and Tourism
- Chapter 13 Landscape and visual
- Chapter 7 Air Quality

### **Relevant background information to the review**

6.2 In the 29.9.23 response to the Norwich to Tilbury EIA Technical Note Public Health made the following observations:

## **Mental Health**

- (a) The N2T EIA Technical note refers to the IEMA (Institute of Environment Management and Assessment) guidance Effective Scoping of Human Health in Environmental Assessment. That guidance states that the wider determinants of health to consider should include 'the mental health effects of widespread concerns about exposure from major electrical infrastructure or radiation sources. Furthermore, in the Scoping Opinion section 3.8.1 Health related environmental change – construction and operation, the Inspectorate states that *'consideration should be given to direct and indirect impacts to both the physical and mental health of receptors, as well as the potential for particular effects on any vulnerable populations.'*

Norfolk County Council Public Health notes that N2T EIA Technical Note omits mental health during the operation of the development from the scope. Given the above considerations, Norfolk County Council Public Health would like the effects on mental health during operations included within the scope, and that N2T EIA Technical note should detail the methodology for assessing this.

## **Study Area**

In N2T EIA Technical note the study area is defined *using professional judgement and experience of similar linear projects and is further defined by the Local Authority boundaries in which the Project is located*. This implies that only the health effects on the local and/or regional population, as represented by the geographical scale of the Local Authority area will be included. IEMA guidance Effective Scoping of Human Health in Environmental Assessment states: *Health effects vary between geographical areas. The geographic scope should have regard to the populations within relevant geographic zones of influence or study areas, for example, site-specific population, local population, regional population, national population, international population.*

Norfolk County Council Public Health would like the geographical scale of the study area to present more granular data about the nature of the local populations along the proposed development depending on the availability of data, such as LSOA (Lower Super Output Area), MSOA (Middle Layer Super Output Area) and ward level data, for example, as well as data at local authority level.

## **Review**

## **Chapter 10 Health and Wellbeing**

- 6.3 The chapter discusses the potential effects on; health related environmental change (e.g. air quality, noise, traffic and transport) during construction and operation; both physical and mental health and wellbeing; and both the general population and vulnerable groups

- 6.4 The PEIR recognises that mental health is a priority in the majority of the joint strategic needs assessments for areas affected by the project but the PEIR does not provide detail on how mental health can be affected by concerns over electric and magnetic fields (EMFs) or visual impacts, nor the distance from source this concern can extend. The PEIR does not include a mental health impact assessment during operation nor does it detail the method for assessing this, as was requested by Public Health in response to the EIA Technical note above.
- 6.5 National Grid should undertake a Mental Health Impact Assessment (MHIA) to review the evidence of the effects of EMFs identifying residents worries and concerns or living near high voltage power lines and including a literature review of the latest evidence available. This review would help to inform the boundaries of the study area and in turn what additional mitigation measures may be possible.
- 6.6 Public Health would like more detail about the messaging and awareness raising that National Grid intend to undertake for the duration of the project in particular with respect to EMFs included in the ES.
- 6.7 The PEIR includes a summary of health effects relating to both physical and mental health during construction and operation and maintenance phases. Due to the large study area used this is imprecise. Table 10.1 – stakeholder engagement – states that baseline data will be updated for the ES but does not state what form this will take.
- 6.8 It is noted that the impact of the project on the health and wellbeing of the entire population of South Norfolk is likely to be neutral or not significant. However, as previously requested, greater consideration needs to be paid to the impact of the project on the health and wellbeing of residents and communities living in close proximity to the track of the powerline, using more granular data sets.

## **Chapter 15 Socioeconomics, recreation and tourism**

- 6.9 The chapter covers effects on:
- employment and economic activity during construction.
  - businesses during construction and operation (excluding agriculture).
  - potential future developments.
  - access to community facilities during construction (excluding visual amenity).
  - tourism and recreational assets during construction and operation; and
  - local visitor accommodation during construction
- 6.10 Some 800 FTE Jobs are likely to be created during the four years of construction along the length of the project. This is unlikely to make a significant contribution to employment in Norfolk.
- 6.11 No community facilities or schools are within the local study area in South Norfolk. Seven business or enterprises are within 1km of the study area (two in the Waveney Valley alternative). National Grid should provide



details on how it will engage with these facilities and mitigate any impacts of the proposal.

- 6.12 Public Health notes that access to common land and Public Rights of Way will be maintained as much as practicable during construction and made good after completion.

### **Chapter 13 Landscape and visual**

- 6.13 The chapter covers effects during construction and operation on landscape character and resources and visual amenity including effects upon people.
- 6.14 The assessment concludes that there will be significant negative effects on visual receptors. It is difficult to translate these effects into the impact on the health and wellbeing of people, and the assessment makes no attempt to do so.
- 6.15 National Grid should quantify the number of people living with the 3km study area in order to determine the number of residents who will be disadvantaged by the project.
- 6.16 The Waveney Valley Alternative has possible negative as well as positive benefits for visual amenity. National Grid should consult residents in the Waveney Valley for their preferred option.

### **Chapter 7 Air Quality**

- 6.17 The chapter assesses the potential effects during project construction including dust, traffic and non-road mobile machinery (NRMM) emissions. The assessment takes note of the more stringent targets for Particulate Matter (PM<sub>2.5</sub>).
- 6.18 No designated air quality management areas are adjacent to the pylon route in South Norfolk. The assessment concludes that construction will not cause the exceedance of any pollution emission targets. There are a number of human receptors within 250m of the pylon route but no vulnerable receptors such as care homes or schools.
- 6.19 National Grid should make direct contact with all receptors within 250m of the pylon route and advised them of the means to raise concerns or complaints. Any complaints made should also be reported to the Environmental Health Department of the relevant Local Authority.

## **7. Service Provider Comments and wider Opportunities**

### **(a) Norfolk Fire and Rescue**

- 7.1 Norfolk Fire & Rescue Service (NFRS) response to emergency incidents should, wherever possible, not be compromised by ongoing construction works, site or road closures relating to the project works. Specific responses will be made as more detail is received but NFRS would urge that due consideration is given at all times to ensuring that emergency vehicles retain the ability to reach Incidents in the fastest and safest manner to protect anyone in danger.

- 7.2 NFRS as a member of the Local Resilience Forum (LRF) considers that any proposed route should not pass directly over any COMAH or high-risk site; initial look suggests this is not the case, but a more detailed investigation is being carried out currently.
- 7.3 NFRS would ask that National Grid engages with and invests in NFRS to help prepare crews for fires or rescues within high voltage electrical installations or around high voltage pylons, this may include training exercises or equipment purchases. NFRS would be looking at developer funding for these items through a S106 agreement.

#### **(b) Economic Development and Skills**

- 7.4 The County Council would ask National Grid to produce a Skills and Employment Strategy to accompany their proposals given the scale of the project and wider links to meeting National targets on renewable energy use and Net Zero. Such a Strategy would need to secure demonstrable benefits to both the local economy and workforce. In addition National Grid should also prepare a Local Supply Chain Plan as the County Council is keen that any such development brings opportunities for local businesses.
- 7.5 The Project Background Document indicates: *“Delivering the infrastructure needed to achieve this ambition will boost local economies, provide jobs and opportunities to learn new skills and bring vital investment to towns right across the country”*. As part of a Skills and Employment Strategy, the County Council would expect National Grid to share information regarding the expected skilled employment needs associated with each phase of the project. Specifically, a breakdown of employment on the project by phase with expected dates, with estimates of types of skilled worker needed at each phase over the lifetime of this NSIP. This breakdown will assist us in understanding the potential impacts on local employment opportunities and enable us to better support the project's objectives within our communities.
- 7.6 The proposals by National Grid need to be seen alongside those offshore windfarms which will make landfall and grid connection in Norfolk; and as such National will need to demonstrate throughout their Planning stages that they are working closely with these offshore wind promoters to ensure appropriate synergy particularly around Norwich Main where Hornsea Project Three; and the Sheringham Shoal and Dudgeon Windfarm extension Projects will make grid connection.

## **8. Lead Local Flood Authority**

- 8.1 In the description of the works included in the project (section 4.1.3) there is only a vague indication of the temporary works associated with the project. However, our understanding is these areas such as haul roads, construction pads and other areas could cover a significant area and could have a significant impact on the surface water flood risk. Therefore, Norfolk LLFA requires better description of the temporary works structures and the length of time they are proposed to be in situ for is included in the project description to better reflect the construction works arrangements.
- 8.2 In section 4.7.8, there is a discussion on the construction impacts of the scheme on Land Drainage with a focus on maintaining the existing land drainage during the construction period and reinstating them after the construction phase. The text in the Existing Features during construction does not consider the crossing of existing ordinary watercourses by the temporary construction works such as haul roads etc. Further information is required, along with ordinary watercourse consents which are likely to be required for all relevant watercourse crossings.
- 8.3 In section 4.8.3 the applicant indicates that the topsoil would be stripped but there is no further information about the type of temporary surface that would be installed in the different types of compounds. These temporary surfaces are likely to result in a reduction of permeability and would increase in surface water runoff. Yet there is no mention of a temporary drainage system being installed. The LLFA would expect to see details on the surface water management for all compounds and temporary construction works features.
- 8.4 In section 4.8.12, the LLFA request confirmation of whether there is a step missing from the summary of the Standard Pad and Column Foundation works or if the formwork is being left in place once the concrete has set. Clarification required.
- 8.5 In section 4.8.23, the LLFA notes that there is no mention or consideration of surface water management at the substations. Further consideration is required.
- 8.6 In section 4.8.29 to 4.8.33, the LLFA notes there is no mention or consideration of surface water management along the underground cable construction sections of the route. Further consideration is required.
- 8.7 In section 4.8.46 to 4.8.50, the LLFA notes there is no mention or consideration of surface water management along the haul road sections of the route. Further consideration is required.

- 8.8 In section 4.8.62 there is an initial acknowledgement that smaller watercourses would need to be crossed using culverts. However, there is no indication of the number of these types of crossing per county. There is a subsequent discussion in section 4.8.65 where the site constraints are listed that could influence the size of the culvert but there is no mention of the LLFA or IDB design requirements as a constraint that would influence the size of the culvert. Further information will be required for the sizing and positioning of the culverts.
- 8.9 In sections 4.8.63 to 4.8.65, there is no consideration of the impact of the proposed structures on flood risk. Further consideration is required.
- 8.10 In the section regarding the temporary construction features there is no discussion on the amount of time these features will be in place. It is likely that some of these features are likely to be in place for a few years. Further information regarding the amount of time these temporary features will be in place is required.
- 8.11 In section 4.9.22 there is no information about the area of the compound extension for the Norwich Substation. As this is a significant area that is almost the same size as the existing substation, it is expected that a platform will need to be constructed for the compound. The platform will require a consolidated base for the platform to facilitate the development that will significantly reduce the permeability of the area and will result in an increase in the surface water runoff. Therefore, surface water management in the form of SuDS will need to be included for this area of the development. Further information is required and space must be provided for suitable structures.
- 8.12 In section 4.10, there is no discussion on the lifetime management and maintenance of SuDS structures that will serve sub-stations and other areas of impermeable infrastructure. Further information is required.
- 8.13 In section 12.2.10, it is noted the applicant has considered the LLFA developer guidance from Essex County Council, but not from Suffolk or Norfolk County Councils. NPPF states in paragraph 175.a "take account of advice from the lead local flood authority". However, only one of the three relevant LLFAs has been taken into account. This is inconsistent and inappropriate to only refer to one of the LLFA's Developer Guidance documents. Further work is required.
- 8.14 In the Flood Risk and Land Drainage section starting at section 12.6.49, it briefly considers fluvial and surface water flood risk in South Norfolk in the first sub-section. However, the description of surface water flood risk is limited and only mentions the areas at very low risk of surface water flooding along the route in South Norfolk. The description is incorrect and

should be updated to reflect the actual baseline situation. Further work required.

- 8.15 In section 12.7.4, the report acknowledges the need for the temporary access roads and haul roads to crossing watercourses. However, mitigation has only been proposed for the main rivers and those with WFD status. This is not acceptable as it is not in accordance with the principles of NPPF, where no increase in flood risk shall be caused by development. This includes along small watercourses and from the construction works.
- 8.16 In section 12.7.4, the LLFA notes that pylons would not be located within 2m of an ordinary watercourse. The LLFA requests justification for the selection of the 2m minimum distance between the pylons and an ordinary watercourse. The LLFA developer guidance is clear that a minimum buffer width of 3.5m from the top of bank to facilitate access for maintenance is required. Norfolk LLFA expects that pylons in Norfolk are at least 3.5m away from the top of bank of an ordinary watercourse. Further work required.
- 8.17 In section 12.7.6, W07 appears to focus the sequential testing on the fluvial flood zones and the associated floodplains with no consideration to other sources of flood risk. The LLFA notes that paragraph 168 of NPPF requires the sequential test to steer new development to areas with the lowest risk of flooding from any source." Therefore, W07 to be altered to reflect the consideration of other sources of flood risk, such as surface water flood risk, in the application of the sequential test for both the construction phase and the operational phases of the project. Further work required.
- 8.18 In section 12.7.6, there is no mention of the mitigation needs to ensure that culverted ordinary watercourse crossings do not increase flood risk. While in section 12.7.9 for additional mitigation, the use of crossing methodologies is currently being developed for all watercourses there is a mention of the need for ordinary watercourse consents. This should be considered as a standard mitigation rather than as an additional mitigation. The mitigation to prevent the proposed development from increasing flood risk throughout its lifetime is a requirement of NPPF. The need for consents for this work has been in place since at least 1991. Therefore, the mitigation from all sources of flood risk is not an optional matter and should be addressed as a standard mitigation requirement and should not be considered as an "over and above" matter. Further work is required.
- 8.19 It should be noted that in section 12.8.4, the effects on watercourses, their water quality and hydro morphology are scoped out for operation (and maintenance). However, in section 12.7.6, W14 indicates that "Temporary construction haul roads (including temporary bridges and culverts) are likely to be removed unless identified as offering a long-term improvement to the environment and land usage during the design (and agreed with the

landowner)." This is again repeated in section 12.8.37. Should it be the case that temporary structures would remain in place for the operational phase, then it would be necessary to assess the effect of these structures in the operational phase as the project would now have an effect on them in this phase. Further consideration of this matter is required before scoping in or out of this work can be confirmed.

8.20 It is not until section 12.8.29 to 12.8.31, that there is some acknowledgement of the likely negative effects of the construction phase to surface water runoff and flood risk that will require management. These negative effects have not been sufficiently acknowledged or discussed prior to this point in this chapter and better inclusion of them is required so that suitable mitigation measures can be included in the standard mitigation measures.

8.21 In section 12.9.1 and section 17.7.1, there is a brief discussion on the flexibility in the construction programme which focuses on a change in the start date. However, there is no consideration of a longer period of construction. The LLFA request justification of why this has not been considered. Further information required.

8.22 In table 17.2, Flood Zones are listed as a cumulative receptor. It is not clear what is meant by this receptor. Clarification is requested or alternatively an amendment to the text. Further work required.

8.23 In Table 18.1 and table 18.2, it is stated that for Hydrology and Land Drainage that "No likely significant effects identified at this stage". However, the LLFA consider that not all of the effects have been appropriately considered at this stage, such as the management of surface water runoff from the temporary works. Therefore, until this work has been included, it is not possible to make a summary statement. Further work required.

### **Norwich to Tilbury - PEIR - Volume II - Figures**

8.24 In Figure 4.1 on Page 1 of 60, the plan shows the proposed location of the substation along with the temporary attenuation basin and the proposed overhead lines SuDS attenuation basin. These areas appear to not consider the impermeable area created by the platform for the substation. The platform will require a consolidated base for the platform to facilitate the development that will significantly reduce the permeability of the area and will result in an increase in the surface water runoff. Therefore, surface water management in the form of SuDS will need to be included for this area of the development. While this application focuses on the pylons, other aspects of the development such as the proposed substation will need to ensure there is sufficient space available.

8.25 In Figure 4.1, there are substantial laydown areas mark on the plan for the assembly of the pylons. However, in the main report it is not clear what, if any, work will be undertaken to prepare these laydown areas for use. For example, it is not clear whether any material will be either removed or laid to form the laydown areas. It is also not clear what remediation work will occur to ensure the subsoils are not excessively compacted to prevent and increase in flood risk. Further information is required in the report and subsequent assessments.

8.26 In Figure 12.1, Hydrology and Land Drainage: Study area and Water Environment Features, the LLFA notes the majority of the ordinary watercourses are not marked on the plan. The LLFA reminds the applicant that Ordinary Watercourses are defined as; every river, stream, ditch, drain, cut, dyke, sluice, sewer (other than a public sewer) and passage through which water flows and which does not form part of a main river. In Norfolk there are approximately 7,178 km of mapped ordinary watercourses that are included in the Environment Agency's Detailed River Network dataset. This is undoubtedly a conservative figure as many ordinary watercourses in Norfolk remain unmapped. In terms of local flood risk management, these watercourses are still largely influenced by the Land Drainage Act 1991. Therefore, the LLFA requires the applicant to update their mapping to identify all the ordinary watercourses within the redline boundary and wider study area. This will be needed to identify all the temporary (and any permanent) watercourse crossing and discharge locations in order to assess whether there is any increase in flood risk. Further work required.

8.27 In Figure 12.2, Hydrology and Land Drainage: Flood Risk Areas, there are a number of surface water flow paths that align with ordinary watercourses shown on the OS background mapping and the interaction with the temporary and permanent works. The LLFA requires better consideration of the surface water flow paths and proposed structures is required to ensure there is no increase in flood risk.

**Norwich to Tilbury - PEIR - Non-Technical Summary (National Grid Ref: AENC-NG-ENV-REP-0001, April 2024)**

8.28 In section 5.8.4, the watercourses listed focus on Main Rivers. While in section 5.8.6 which is meant to focus on surface water runoff, ordinary watercourses are listed while talking about Flood Zones (which are associated with flooding from rivers and sea). It will not be clear to either a non-technical or technical reader what information is being presented in the surface water section as it focuses on watercourses and flood zones associated with watercourses. Further work is needed to better communicate the sources of risks in this section. Further work required.



8.29        The LLFA would like to take the opportunity to remind the applicant that while the FRA will aim to address the flood risk, a separate drainage strategy will need to be prepared for the construction and operational phases.

# Planning and Highway Delegations Committee

## Appendix 4

Input for the Consultation on National Grid Norwich to Tilbury scheme, from Councillor Catherine Rowett (with a focus on West Depwade issues).

General considerations:

1. There is widespread dissatisfaction with the approach to this scheme in the following respects:
  - a. The failure to include or consult on the option of an offshore undersea cable, as though that option had already been closed off before anyone in Norfolk was even asked how we should deliver the necessary grid upgrade. The consultation documents give a link to what they say is a response to the offshore option but there is nothing clear at the link, and there is a general dissatisfaction with the impression that they are not really giving us the chance to consider and recommend that solution.
  - b. The pre-emptive onshoring as far as Dunston, without establishing the viability of a route further south and without any consultation of those who would be affected by the rest of the route to Tilbury, as a result of which the need for an onshore route beyond Norwich becomes necessary, at risk of making the line to Norwich redundant. This order of events treats the cable as a fait accompli, and leaves East Anglia with the fallout of a decision that should never have been made.
  - c. The late action on upgrading the grid, which should have been undertaken with foresight in advance of building offshore wind farms, so that proper systems could have been installed ready for those wind farms to be connected to without the chaotic quick fix multiple landfall locations that we are seeing now.
  - d. The dismissive attitude towards the unspoiled and precious landscapes and natural habitats of East Anglia (and Lincolnshire), as compared with other landscapes and habitats where nature is given due respect, as evidenced by the fact that offshore cabling is prioritised for other areas of Britain, while East Anglia seems to be regarded as a flat place that no one cares about. For many who have chosen to live among the wide open spaces and under the spacious skies of Norfolk, this failure to regard rural England as precious appears extremely unfair, and fails to recognise the importance of Norfolk artists such as the Norwich watercolourists, who celebrated exactly this, in much the same way as Constable celebrated Dedham Vale.
2. Specific comments: technical and infrastructure.

- a. The proposal to go underground at the Waveney Valley might seem to be an improvement, but it will result in additional infrastructure at the start and end of the underground cabling, including permanent compounds etc.
- b. Underground cabling for the whole route would potentially be preferable if this could be High voltage DC, with conversion to AC required only at the end of the entire journey. This would save wide trenches and changes from overhead to underground.
- c. In general underground cabling is just as disruptive to the natural environment, especially if it is done for AC transmission, and it should not be considered a good second best. It includes the same or potentially more damage to woodlands, hedges and just as much traffic on the non-existent access roads.
- d. As before I would suggest that in the event that underground cabling with AC current is chosen, attention should be given to siting the places where the heat is released in such a way that local businesses, farms, schools, communities, swimming pools or institutions could benefit from harvesting the waste heat, to give some reduction in energy demand and costs for the county and to bring benefits to the economy and avoid waste.

### 3. Specific comments: the suggested route

- a. It appears that the proposed route has been drawn up by looking for sparsely inhabited areas and drawing a line through those bits of countryside. This is a foolish and destructive approach, since those parts are the ones with no adequate access roads, a network of narrow tracks and fords, precious wetlands and fens, unspoiled medieval field systems that have remained untouched for centuries, and isolated ancient barns and manor houses that date back to the doomsday book. There are few places in the UK that are remote enough to have their soils, water courses and woodland untouched by industrialisation. This route targets precisely those last remaining bits of unspoiled natural habitat, and does so systematically--whereas a route through areas that are already spoiled with human installations and industrial estates would be much better. This is particularly so if the roofs of buildings in industrial areas could be used to host solar panels that could also be linked into the new grid capacity.
- b. It is unclear why the route chosen did not follow alongside the existing line of pylons, and alongside the railway, where the existing infrastructure already scars the landscape and another line of pylons, while more noticeable, would not disfigure a new line of otherwise pristine countryside. Taking the power lines alongside the railway would seem to make more sense and would deliver a straighter and simpler route.

- c. The route passes too close to the Tibenham Airfield, and will make gliding impossible in this area. It appears that the route plan was drawn up in ignorance of the importance of Tibenham Airfield for those involved in this sport. This airfield is home to Norfolk Gliding Club and is has been listed by central government as an important national and local asset.
4. Buildings and archaeology
- a. There are four remarkable medieval Hall houses in Bunwell, and the pylons are scheduled to land beside two of them (Banyards Hall and Persehall Manor).
  - b. There are several other listed buildings that will be directly impacted with a pylon right next to them. The pylons will be almost twice as high as Tibenham Parish Church tower, and will dwarf the iconic church buildings that are such a traditional feature of the landscape.
  - c. The Tas Valley land is untouched for centuries. It has its original medieval small field layout. It's not accessible by road. A tumulus has recently been identified there.



5. Nature and biodiversity
- a. The Tas River has a chalk bed - apparently one of only a few hundred such rivers in the world.
  - b. Much of the land in the Tas valley is designated as a county wildlife site. Being remote and untouched means that it is particularly rich with species of wildlife that aren't surviving in more damaged environments.
  - c. National Grid plan to drive a haul road (under the pylon run) across an exquisite grazing meadow, between two wildlife sites. See this map

provided by The Norfolk Wildlife Trust, and a photo provided by a resident. It is my understanding that the green areas on the map are designated wildlife sites.







- d. The planned haulage and work sites will involve extensive damage to hedgerows and trees. There is no way that offering an alternative “biodiversity net gain” site can make up for eliminating the habitats of the creatures for whom this is home. Other sites that might be earmarked for biodiversity have their own species already. Both need to be preserved. One does not offset the other any more than feeding someone else’s baby is a substitute for feeding yours.
- e. The planning application documents indicate a level of construction site disruption that is incompatible with a rural environment such as this, and it appears to me that National Grid hugely underestimates the limitations of the road system in this remote part of Norfolk.

#### 6. Rights of ownership, easement and rights of way

There is an alarming expectation that this project can ride roughshod over land ownership (proposing compulsory purchase), rights of customary use, and rights of way. Some of these will seriously disrupt the ability of residents to get to their local facilities such as schools, churches, shops, bus stops and so on. This is treated as a matter of no consequence, which suggests that the plan has been drawn up by someone who has no idea of the importance of our network of off-road footpaths where roads are long, winding and too dangerous for walking. We have already seen long and unsatisfactory closures of rights of way for the upgrading of the existing pylons, and these too should have been challenged.

## 7. Future proofing

I (and the residents of my division) are keen to see infrastructure fit for the future and to have the energy system in this country converted to renewables as soon as is reasonably possible.

I lament the late start on this essential grid upgrade, and the foolish step by step approach that has landed us with the worst solution to what is now an urgent problem. I would favour a coherent national investment in proper infrastructure to support the offshore wind production, including an integrated offshore system to which additional offshore generation could be added as it comes on stream. I do not regard it as appropriate to bring offshore power onshore at a point hundreds of miles from its destination.

I favour using onshore distribution solely for local onshore renewables, with a preference for more local community energy schemes that are directly distributing their power to adjacent dwellings and businesses, rather than feeding everything into the grid.

I do not accept that the current approach to solving the gridlock is the best one. I consider that this is being pushed through in haste and that the future needs of the country would be better served by focusing on delivering a scheme that could handle what will be needed in the next 50 years, as well as by increasing our focus on saving energy and avoiding replacing one source of energy with another, to continue consuming more than is required, where reducing the energy demand and living better as a result would deliver a better world. For example, we should not aim to retain the dominance of the private car, but rather focus instead on providing adequate power to run good fast electric trains from Norwich to Ely.



# Planning and Highway Delegations Committee

## Appendix 5

### Comments expressed by Scrutiny Committee 22 May 2024

#### 1. Preface

1.1 The comments below were raised by the County Council's Scrutiny Committee on 22 May 2024:

#### 2. Scrutiny Committee Comments

Members of the Scrutiny Committee received an extensive update, setting out the proposed NCC consultation response, at the meeting held on 22 May 2024. This piece of work constituted an item of pre-scrutiny, and comments from the committee are set out below to inform discussions at the Planning and Highways Delegations Committee.

Members of the Scrutiny Committee strongly opposed National Grid's proposed pylon route across Norfolk and endorsed the overall council position of opposing the plans as proposed, drawing particular attention to discussions at Full Council on the 7<sup>th</sup> May 2024, and the key strategic comments set out by officers in the report. Members agreed that alternative options should be reconsidered, including offshoring and undergrounding of cables.

Members also agreed with the Independent Report Commissioned by the three County Councils (Norfolk; Suffolk; and Essex), the findings of which do not support National Grid's delivery timetable of 2030; and instead suggest additional capacity to the Network is not needed until 2035 +. This would allow for a **pause** in the current proposal and the opportunity for alternative options to be more thoroughly assessed by National Grid.

In addition, Scrutiny members raised the following areas of concern:

**Local Energy Supply** - National Grid's Proposal would see energy flowing through Norfolk without any benefits to local communities or businesses. Members felt that if energy is to flow through the County there needs to be opportunity for tapping into the transmission network to enable supply of electricity to support planned housing and employment growth;

**Compensation** – Members raised the issue regarding the need for appropriate compensation for those residents and businesses affected by National Grid's proposals both during and after construction;

**Tas Valley** - Members enquired as to whether a landscape assessment had been considered for the Tas Valley. It was noted by officers that a joint

landscape survey had been carried out in partnership with Suffolk County Council to cover the Waveney Valley area. If members wanted to see further activity to cover the Tas Valley, it would likely have to come as a recommendation from the Planning and Highways Delegation Committee and would need to take place in partnership with local planning authorities.

**Carbon footprint** – The committee questioned whether a detailed assessment of the potential carbon footprint for the project as proposed had been carried out by National Grid, with comparisons drawn to alternative options such as offshoring. It was agreed that the Committee would request that the Planning and Highways Delegations Committee take this under consideration when responding to the consultation.

**Alternative routes** - Members queried whether alternative routes had been considered to more closely mirror existing energy infrastructure or railway lines. Members received assurances from officers that alternative routes had been raised, but the consistent view of the departments was that if the offshoring option wasn't selected, then the route should be undergrounded entirely through Norfolk.

**Pausing the project** – Members noted that Suffolk County Council had requested a pause in the project to allow for other options, including offshoring, to be reconsidered – with the potential to be integrated with developing coastal windfarm projects in the region. Scrutiny members agreed that a pause would allow for a more developed discussion around alternative options, and that this should be considered by the Planning and Highways Delegations Committee when they produce the formal response to the consultation.

**Cumulative impact** of energy/electrical infrastructure in Norfolk – Members raised concerns regarding the increasing detrimental impact to Norfolk of developing electrical infrastructure. When viewed holistically rather than as individual projects, the cumulative impact both aesthetically and agriculturally on Norfolk was significantly greater. Officers agreed that this was an area of serious concern and should be considered by the Planning and Highways Delegations Committee.

**Economic Feasibility** – Members noted that the pylon route as proposed had been outlined by National Grid as the most economical option, but questioned whether costings for alternative options were clearly publicised for consideration by stakeholders. Members suggested that the Public Highways and Delegations Committee consider the depth of data available when producing a consultation response.

**Timeline for completion** – members of the Scrutiny Committee questioned the feasibility of the project timeline as proposed, with work due to be completed by 2030. It was noted that this was ambitious, especially considering that a final decision wasn't due by the Secretary of State until

2026. Members requested that the Planning and Highways Delegations Committee consider pushing back with regards to the proposed timeline.