

Planning and Highways Delegations Committee

Date: **Friday 8 September 2023**
Time: **10am**
Venue: **Council Chamber, County Hall,
Martineau Lane, Norwich**

Advice for members of the public:

This meeting will be held in public and in person.

It will be live streamed on YouTube and members of the public may watch remotely by clicking on the following link: [Norfolk County Council YouTube](#)

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Current practice for respiratory infections requests that we still ask everyone attending to maintain good hand and respiratory hygiene and, at times of high prevalence and in busy areas, please consider wearing a face covering.

Please stay at home if you are unwell, have tested positive for COVID 19, have symptoms of a respiratory infection or if you are a close contact of a positive COVID 19 case. This will help make the event safe for attendees and limit the transmission of respiratory infections including COVID-19.

Committee Membership

Voting Members:

Cllr Andrew Jamieson
Cllr Graham Plant
Cllr Eric Vardy

Non-Voting Members:

Cllr Graham Carpenter
Cllr Brian Long
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

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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 26 October 2022

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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 – Non-Statutory Consultation by National Grid

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Report by the Interim Executive Director of Community and Environmental Services.

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

Date Agenda Published: 31 August 2023



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Planning and Highways Delegations Committee

**Minutes of the Meeting held on 26 October 2022 at 10am
in the Council Chamber, County Hall, Norwich**

Voting Members Present:

Cllr Martin Wilby (Chair)	Cabinet Member for Highways and Infrastructure
Cllr Eric Vardy	Cabinet Member for Environment and Waste

Non-Voting Members Present:

Cllr Brian Long	Planning (Regulatory) Committee Chair
Cllr Paul Neale	Planning (Regulatory) Committee Green Group Spokesperson

Officers Present:

Naomi Chamberlain	Senior Planner
Stephen Faulkner	Principal Planner
Sarah Luff	Strategic Flood Risk Planning Officer
John Shaw	Developer Services Manager
Tim Shaw	Committee Officer
Dean Shelton	Senior Flood Risk Officer
Matt Tracey	Growth & Infrastructure Group Manager
Joe Wyatt	Officer, Community and Environmental Services

1 Apologies for Absence

1.1 Apologies were received from Cllr Graham Carpenter, Cllr Graham Plant and Cllr Mike Sands. Cllr Riley was also absent.

2. Election of Chair

2.1 Cllr Vardy nominated Cllr Wilby. Cllr Wilby was duly elected as Chairman for the ensuing Council year.

3. Election of Vice-Chair

3.1 Cllr Wilby nominated Cllr Plant seconded by Cllr Vardy. Cllr Plant was duly elected as Vice-Chairman for the ensuing Council year.

4. Minutes

4.1 The minutes of the meeting held on 27 August 2021 were agreed as an accurate record and signed by the Chairman.

4.2 Cllr Paul Neale queried when the minutes were published. Tim Shaw agreed to check when these were published but clarified that minutes of meetings were usually published within a month of the meeting in question. **It was confirmed after the meeting that these minutes were published and circulated to Committee members on the 8 September 2021**

5. Declarations of Interest

5.1 There were no interests declared.

6. Urgent Business

6.1 There was no urgent business discussed.

7. Sheringham Shoal and Dudgeon Offshore Windfarm Extension Projects - Submission Consultation

7.1.1 The Committee received the report assessing the proposals for the extension of two offshore windfarms and the onshore ancillary grid connection infrastructure in Norfolk. The final decision for these proposals would be determined by the Secretary of State for Business, Energy and Industrial Strategy as it was defined as a Nationally Significant Infrastructure Project under the Planning Act 2008.

7.1.2 The Senior Planner introduced the report to Committee

- The Council had responded to the pre-application which was approved by the Committee in June 2021.
- The report covered proposals for extension projects of Sheringham and Dudgeon Offshore Windfarms off of the North Norfolk Coast. It was proposed to extend the windfarms by up to 53 windmills.
- The distance from the coast was 16km at Sheringham and 27km at Dudgeon. The turbines were estimated to be 330 metres high, with the overall size to be determined at a later stage.
- The capacity for the windfarms would double to approximately 700 megawatts, to supply about 600,000 homes with electricity.
- Landfall for the cable route was proposed to be at Weybourne with a cable from here to the Norwich main substation
- Approximately 2200 jobs would be created from the construction and 230 long term jobs would be created of which 85 would be in East Anglia
- The County Council would like to see a local community benefit fund prepared outside of the Development Consent Order (DCO) process and the applicant had stated in response to comments about the impact on fishing communities that there would be compensation provided.

7.1.3 The Principal Planner also gave an introduction to the report:

- The next stage would be an examination making comments through the local impact report.
- Officers were engaged with Equinor on a number of key issues including highway matters. There were ongoing issues around the traffic management plan and cumulative impacts of projects where the cable was making landfall and officers wanted to protect environmental assets and ensure highway safety was maintained
- As lead local flood authority there were issues which the Council had highlighted. The drainage and flood risk assessment and hydraulic modelling had been received from the applicant but at this stage further evidence and clarification was deemed necessary. The Council would work with the applicant to get requirements set out in the DCO to ensure these issues were covered.
- Members were informed that with regard to secondary interconnection, officers have been in discussion with Equinor; and separately with National

Grid in respect of their emerging East Anglian Green Project. This latter Project may provide opportunities to deliver power to local homes and businesses.

- The recommendations set out in the report proposed that the Council raise a holding objection regarding flood risk and delegate technical responses to officers.

7.2 The following points were discussed and noted:

- No substantive comments had been received from Local Members of areas along the proposed cable route, who had all received consultations on this project.
- Cllr Brian Long raised an interest in flood mitigation as the Chairman of a drainage board. He noted that to mitigate water that would have permeated around the existing station, there would need to be substantial measures in place to control flow rates from the stations and felt it was important to report back what mechanisms these mitigation measures would look like.
- The Principal Planner confirmed that the substation was part of the DCO decision and not covered by the Town and Country Planning Act and therefore not decided by South Norfolk District Council. However, they were a consultee on the DCO. There were other proposals at the Norwich Substation of which South Norfolk District Council would be the planning authority.
- A Committee Member asked if there was provision to make net gains on environmental impacts as Communities had raised concerns about this; The Principal Planner confirmed that this was covered by District Councils via environmental management plans from the applicant to be signed off by local planning authorities. Officers also confirmed that a Biodiversity net Gain Strategy had formed part of the DCO submission.
- The Principal Planner confirmed that around 12 letters had been received by the Council about this project. Other bodies such as district and parish councils also had the opportunity to respond to the DCO and where they had raised concerns the Council advised them to respond to the consultation. However, where concerns raised related to a statutory role of the Council, such as flooding or highways, these would be picked up.
- Compensation for those affected by cumulative effect of construction was queried by Cllr Neale and the officer indicated that any such compensation would be paid for by the applicant (not the Local Authority), but agreed to follow up with confirmation via a written response after the meeting.
- More information was requested on the set up of the local community benefit fund; The Principal Planner confirmed that the Council had asked the promoters of the scheme to recognise the impacts beyond immediate planning and had asked Vattenfall and Orsted to set up a fund as a charitable trust for local communities to bid into. The Growth & Infrastructure Group Manager added that the Council was having discussions to ensure they could help local communities access the fund to maximise benefits to local communities.
- Battery storage at Dunston (Norwich Main) was queried; The Principal Planner confirmed that this development was by Orsted and was being taken forward under the Town and County Planning Act to South Norfolk District Council as the local planning authority for this application. The County Council had been involved as a statutory consultee and would input through the planning process.

- Cllr Paul Neale asked whether the local district council would receive income from the cables hitting landfall in Weybourne. The Principal Planner agreed to provide a written response on this.
- Cllr Vardy noted that the planning inspectorate would hold a public Examination on the proposals set out in the report so residents could register their desire to speak on them at that stage. At this stage, the County Council were a consultee and were not determining the proposals.

The Committee **RESOLVED**

1. To support the principle of these offshore renewable energy proposals, subject to the detailed technical issues /comments set out in this report and Appendix 2 of the report being resolved through the DCO process;
2. There is a holding objection at this stage from the County Council as the Lead Local Flood Authority (LLFA) in the absence of acceptable supporting information; and
3. To delegate any further detailed technical responses needed to officers as part of the above consultation and/or in preparing any further evidence for the Examination of the DCO

The meeting ended at 10:34

CHAIRMAN



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Planning and Highway Delegations Committee

Item No: 7

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

Date of Meeting: 8 September 2023

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

Responsible Director: 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: 1 June 2023

Executive Summary

The County Council along with other stakeholders and local communities has been consulted by National Grid on their preferred route alignment for a new 400kV overhead power line between Norwich Main to Tilbury (Essex) a distance of 183 km. This report relates principally to those elements of the proposed project which sit within Norfolk as well as those parts of the project which have cross-boundary impacts for both Norfolk and Suffolk. The Project will be taken forward as Nationally Significant Infrastructure Project (NSIP) and will be determined by the Secretary of State for Energy Security and Net Zero. The County Council responded to an earlier round of consultation (June 2022) raising a number of strategic and detailed comments; and this report reaffirms these previous comments. There remains significant strategic concerns which need to be resolved with both National Grid and the Department for Energy Security and Net Zero regarding alternative offshore options needing further investigation. In addition, should the project go ahead in its current form, there are a number of detailed design and implementation issues, which will need addressing through the Development Consent Order (DCO) process.

Introduction from Cabinet Member

The proposed route alignment for the overhead lines raises a number of serious concerns to the County Council. While the County Council recognise the need to add

capacity to the existing transmission network to cater for the additional power being generated from offshore wind farms and the additional power in the future from Sizewell C, it is felt that both National Grid and Government (DESNZ) need to carry out, in line with the County Council's Climate Strategy (2023) further investigations into:

- The offshore option – involving an offshore transmission network capable of delivering power direct from source to the Tilbury / Grain substations where power will be distributed to the wider National Transmission System;
- 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 underground to avoid landscape impacts; and impacts on local communities in Norfolk; and
- Upgrading where possible the existing over-head power lines to increase capacity.

In the event of an onshore above ground solution being deemed absolutely necessary, National Grid should make a commitment to explore the wider potential benefits and opportunities to provide power to meet the needs of existing and planned growth in Norfolk. In addition, there needs to be appropriate mitigation along the route particularly around Diss and the Waveney Valley where it is felt that an alternative route and under-grounding needs to be taken forward.

Recommendations:

The Committee is asked to:

1. **Agree the comments set out in this 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.**

1. Background and Purpose

- 1.1 The purpose of this report is to consider National Grid's draft proposal and route alignment for their Norwich to Tilbury project www.nationalgrid.com/norwich-to-tilbury; and to agree the County Council's response to the non-statutory consultation. The project, which is set out in more detail below, broadly comprises a new 400kV overhead power line between Norwich Main substation and Tilbury substation in Essex. The Project had previously been known as East Anglia Green but has now been changed by National Grid to make it clear that this work is part of [The Great Grid Upgrade](#). All National Grid (NG) projects that are part of The Great Grid Upgrade will include specific locations in their names to make it easier for people to understand where NG are proposing to build new grid infrastructure. A further

transmission project has been announced by NG involving a new 400kV line between Grimsby to Walpole, although at the time of writing this report there has been no formal or informal consultation on the project (see Assessment section below).

National Infrastructure

- 1.2 Given the scale of the project (see Section 2 below) 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 for Energy Security and Net Zero.
- 1.3 This is a non-statutory consultation and will be followed by two formal statutory consultation stages involving:
 - Consultation on the Preliminary Environmental Information Report (PEIR) under Section 42 of the 2008 Planning Act – expected Spring/Summer 2024; and
 - Consultation on the submission of the Development Consent Order (DCO) application expected early 2025 (under Section 56 of the Act).
- 1.4 The above consultations will be followed by a six-month Public Examination led by the Examining Authority (ExA) appointed by the Planning Inspectorate (PINS). The ExA will then make a recommendation to the Secretary of State (SoS). The final decision on this project will be made by the SoS. It is likely that once National Grid have submitted their DCO, it will take 18 months before a decision is made. National Grid position is that construction will commence from 2027 and the project will be operational by 2031.

Previous Comments

- 1.5 The County Council responded to the first non-statutory consultation in June 2022 in a letter, and accompanying detailed comments, sent to National Grid by the Leader of the Council (see Appendix 3). These comments were subsequently reported to Scrutiny Committee on 14 December 2022. The Committee endorsed *“Norfolk County Council’s response to National Grid’s non-statutory consultation (2022) on the above High Voltage Cable Route proposal, including the letter from the Leader of Norfolk County Council to National Grid.”* The County Council’s 2022 response, *inter alia*, urged National Grid and Government to consider:
 - An Offshore option;
 - Underground option in the event that offshore solution is not feasible; and
 - Upgrading the existing over-head power lines to increase capacity.
- 1.6 Officers have subsequently been in further technical discussions/meetings with National Grid on their project as well as receiving regular updates on the status

of the project from the applicant. In March this year there was a Member meeting with Suffolk County Council relating to cross-boundary issues in the Diss / Waveney Valley area. This resulted in a letter from Norfolk County Council being sent to National Grid, asking them to:

“...undertake a detailed examination of the option of realignment of the route to the East of Diss and across the Waveney Valley, with a combination of overground and underground cable options. At the same time, opportunities to integrate the proposed transmission scheme with the existing distribution network (both 400 kV and 132 kV) should also be examined in detail.”

The Full letter from Cllr Plant can be found in Appendix 4. A similar letter was sent from Suffolk County Council to National Grid covering the above matters.

National Policy background

- 1.7 According to National Grid growth in offshore wind generation and new nuclear generation in East Anglia will make a significant contribution in reaching the net Zero targets, with generation in this area potentially contributing over 25% of UK demand at any given time depending on the prevailing wind conditions.
- 1.8 The UK Government published the British Energy Security Strategy in April 2022 setting out a strategy for secure, clean and affordable energy for the long term. The strategy sets out the UK's energy ambitions, which includes up to 50 GW of offshore wind connected by 2030, sufficient to supply all homes in the UK.
- 1.9 National Policy Statement (NPSs) are designed to provide guidance for decision-makers when considering or determining NSIPs. The current set of NPSs were designed by the Department of Energy and Climate Change in 2011 and are currently under review. The most relevant is the NPS for Electricity Networks (EN-5) ([National Policy Statements for energy infrastructure - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-policy-statements-for-energy-infrastructure)). Within the NPS (EN-5) there is specific reference to the guidelines for routing overhead lines known as the Holford Rules.
- 1.10 The Government released a summary of outputs [of the Offshore Transmission Network Review in July 2023](#) and National Grid will need to fully consider these outputs as part of the development of the project alongside any study produced by National Grid ESO following the Government's decision on voluntary coordination of projects and how any changes to offshore infrastructure could change the transmission needs across East Anglia.

County Council Climate Strategy

- 1.11 Since previously commenting on the earlier iteration of the above project, the County Council has produced and endorsed its Climate Strategy (2023), which 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.”

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.

2. Proposal and Overview

The Project

- 2.1 As with the previous non-statutory consultation in 2022, the project involves:
- Building a new high voltage (400 kV) network between Norwich and Tilbury (Essex) some 183 km– which would involve a 30 km stretch of overhead lines and pylons (approximately 89 towers) in Norfolk;
 - Work at existing substations at Norwich Main; Bramford (Suffolk); and Tilbury (Essex); and
 - a new substation in Tendring (Essex).

Other ancillary works required to facilitate construction and operation include:

- Temporary use of land for construction; site offices, storage and access;
- Land required for mitigation; compensation, and enhancement of the environment (Biodiversity Net Gain).

The precise detail of the project in terms of tower design and height; and any associated mitigation works are not known at the present time and will form part of the formal/statutory consultation process referred to above.

- 2.2 The proposed over-head power lines are likely to comprise conventional pylons with a tower height of 45-50m at intervals of 350-400m; and this consultation provides in more detail the proposed alignment of the overhead lines (See Maps 1 - 6 in the Appendix 1). It is understood that the works required at Norwich Substation would be subject to a separate planning application carried out under the Town and Country Planning Act and would be determined by the Local Planning Authority (South Norfolk District Council).

The Reason for the Project

- 2.3 The proposed reinforcement is needed according to National Grid to provide additional capacity to the network to cater for new energy generation from offshore wind, nuclear power; and interconnection with other countries. Norfolk is already the landing point to a number of offshore windfarms (e.g. Sheringham Shoal (2012) and Dudgeon (2017)); and this will increase substantially with the additional planned offshore windfarms, including the following consented projects: Norfolk Vanguard (1.8 GW); Norfolk Boreas (1.8 GW – work currently stopped); Hornsea Project 3 (2.4 GW); and proposals to extend / double the generating capacity of the Sheringham Shoal and Dudgeon Offshore windfarms. The existing network carries around 4,500 MW of electricity and is expected by 2031 to have to cater for an additional 14,000 MW taking the total to 18,500 MW.
- 2.4 The Project in accommodating the above wind farms and other power generation will assist in:
- Meeting the Government's energy ambition, as set out in the British Energy Security Strategy, of up to 50 GW of offshore wind connected by 2030;
 - Meeting the Government's objectives of Net Zero by 2050;
 - Decarbonising the energy system; and
 - Offering the potential to link with the Distribution Network Operator (UKPN) network to enhance its ability to support embedded generation in the County.

Project Considerations

- 2.5 National Grid in identifying their preferred route have taken the following factors into account, along with consideration of the Holford Rules:
- The location of large towns and built-up areas;
 - The location of physical features such as protected sites like Areas of Outstanding Natural Beauty (AONB); National Parks; nature conservation areas;
 - Wider landscape character;
 - Heritage assets;
 - Ecological resources e.g. woodlands and habitats;
 - Recreational Features such as parks, sports facilities and lakes;
 - Residential properties.
- 2.6 As part of the project National Grid have considered a range of reinforcement options through their Strategic Options Backcheck and Review (SOBR), including various combinations of both onshore and offshore developments, the use of alternating current (AC) and direct current (DC) technologies; and upgrading the existing lines. In considering these options National Grid have considered: Deliverability; System Benefits; Environmental Impacts; Socio-economic impacts; and cost benefit analysis. The SOBR concluded that a combination of onshore projects is required including the following:
- Overhead line between Norwich main to Bramford; and

- Overhead line between Bramford via a new substation to Tilbury.

3. Impact of the Project on Norfolk and 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 officer comments on the proposed alignment are set out in the Appendix 2 on a without prejudice basis to the strategic comment below:

(a) Strategic Comments – Overarching Comments

3.2 Since the County Council made its previous comments in June 2022 on the proposed route corridor, National Grid have largely kept to this corridor in respect of their proposed overhead power line and pylon alignment (see Appendix 1 Maps1 - 6). There has been a change to the proposed route alignment west of Diss, which now avoids the power lines going close to Bressingham Steam Museum and Gardens (see Appendix 1 - Map 6) – see comments below (c).

3.3 Given that proposed alignment follows the previous corridor, it is recommended that the County Council’s original over-arching comments (June 2022) should be maintained, urging 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 underground to avoid landscape impacts; and impacts on local communities in Norfolk; 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.

3.4 These alternatives options are consistent with the County Council’s recently endorsed Climate Strategy (2023) and merit further investigation by National Grid and DESNZ as part of the Government’s national response to delivering safe, secure and sustainable energy supplies for the future.

3.5 In addition, further consideration must be made in respect of the Great Grid Upgrade; and recent proposals for a new 400 kV line between Grimsby to Walpole. At this stage it is unclear what the impact of this further proposal will have on Norfolk either in isolation or in combination with the Norwich to Tilbury proposal.

- 3.6 Also given the recent decision by Vattenfall to stop their Norfolk Boreas Project; National Grid will need to consider the impact of that decision on the need for this transmission proposal; and any potential timing issues this may have on the project.

(b) Delivering Green Energy for Norfolk – Comments

- 3.7 In the event that an onshore solution is deemed absolutely necessary, National Grid should make the commitment to explore the wider potential opportunities and benefits for Norfolk in order to ensure that there is accompanying investment in the transmission networks to provide power to meet the needs of existing and planned growth in this area, particularly along the Cambridge Norwich Tech Corridor. This could involve exploring the technology available to rationalise “ the 400kV network so it is able to provide power through the 132 kV network to local communities and businesses where it is needed.
- 3.8 It is therefore recommended that National Grid 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. The County Council through its work on developing an emerging Energy Plan would be keen to explore the technical options available to deliver secondary interconnection; and whether there would be any opportunities for developing a pilot scheme in the County.

(c) Minimising the impacts on Diss and the Waveney Valley - Comments

- 3.9 While welcoming the route re-alignment to the west of Diss which now avoids power lines passing close to Bressingham Steam Museum and Gardens, the current proposals still result in Diss being surrounded to the East and to the West by 400 kV lines (i.e. existing 400 kV to the East). Furthermore, the new lines will interact with UK Power Networks’ 132 kV infrastructure, completing a web of overhead lines to the south of the town.
- 3.10 Norfolk and Suffolk County Councils have been in discussion regarding the cross-boundary issues arising from the above proposals. The Councils consider that the Waveney Valley is of such significance, and that the likely adverse impact of the current proposals on it will be so great, that it is incumbent upon National Grid to deliver a more effective and less harmful scheme for this sensitive area.
- 3.11 The largely undeveloped nature of the landscape to the West of Diss means it is particularly sensitive. It has a combination of important ecological sites, local historic sites and landscape features. This area has important areas of public recreation; as well as significant visitor attraction at Bressingham Steam Museum and Gardens, whose appeal is supported and bolstered by its

landscape character and sense of place, which is likely to be significantly harmed by the proposed 400 kV power line.

- 3.12 Given the above concerns it is felt that National Grid must undertake a detailed examination of the option of realignment of the route to the East of Diss and across the Waveney Valley, with a combination of overground and underground cable options. At the same time, opportunities to integrate the proposed transmission scheme with the existing distribution network (both 400 kV and 132 kV) should also be examined in detail. Please see Appendix 4 Letter sent to National Grid by Cllr Graham Plant.

4. Evidence and Reasons for Decision

- 4.1. Responding to this consultation as recommended will enable the County Council's detailed points on the proposed Norwich to Tilbury project to be considered by National Grid ahead of the next formal stages in DCO process. National Grid will undertake formal statutory rounds of consultation before submitting their DCO and going through Public Examination overseen by the Examining Authority appointed by the Planning Inspectorate. The final decision being made by the Secretary of State.
- 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 in line with the Government's vision for economic recovery that simultaneously addresses the challenge of climate change whilst minimising the environmental impact of the project.

5. Alternative Options

- 5.1. The County Council could choose not to respond to this informal consultation, but this would not enable the County Council's strategic and detailed comments on National Grid's project to be considered and taken into account.

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, including the upcoming statutory consultation stages.
- 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: N/A

There are immediate implications for the County Council as landowner.

7.3 IT: N/A

8. Other Implications

8.1 Legal Implications: N/A

This is a response to an informal non-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. There are no legal implications at this stage to the County Council responding to this informal consultation.

8.2 Human Rights Implications: N/A

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 in line with the Government's vision for economic recovery

8.4 Data Protection Impact Assessments (DPIA): N/A

8.5 Health and Safety implications (where appropriate): The wider Public Health implications of this proposal is set out in the Appendix 2.

8.6 Sustainability implications (where appropriate): These are considered in the main text of the Report.

8.7 Any Other Implications: N/A

9. Risk Implications / Assessment

- 9.1 The County Council is a statutory consultee on any Nationally Significant Infrastructure Project determined by the Secretary of State. Following this informal non-statutory consultation there will be further opportunity for the County Council to respond to this proposal at the formal statutory consultation stages under Section 42 and 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 affect the County Council.

10. Select Committee and Local Member Comments

- 10.1 Given the very tight timetable to respond NSIPs, and to this consultation, there has not been the opportunity to take this consultation through the Select Committee process.
- 10.2 Local Member Comments are set out in Appendix 2; and/ or will be reported orally at Committee.

11. Recommendations

The Committee is asked to:

- 1. Agree the comments set out in this 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.**

12. Background Papers

- 12.1 Norwich to Tilbury - National Grid web-page: www.nationalgrid.com/norwich-to-tilbury
- 12.2 National Grid Web-page on the overhaul of the electricity grid: [The Great Grid Upgrade](#)
- 12.3 The Government's NSIP Action Plan: <https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-nsip-reforms-action-plan>
- 12.4 Scrutiny Committee 14 December - Minutes: [CMIS > Calendar of Meetings](#)
- 12.5 The British Energy Security Strategy (April 2022): <https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-security-strategy>
- 12.6 National Policy Statements (2011): [National Policy Statements for energy infrastructure - GOV.UK \(www.gov.uk\)](#)

Officer Contact

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

**Officer name: Stephen Faulkner Principal Planner – National Infrastructure
Planning Lead Officer**

Telephone no.: 01603 22752

Email: stephen.faulkner@norfolk.gov.uk



If you need this report in large print, audio, braille, alternative format or in a different language please contact 0344 800 8020 or 0344 800 8011 (textphone) and we will do our best to help.

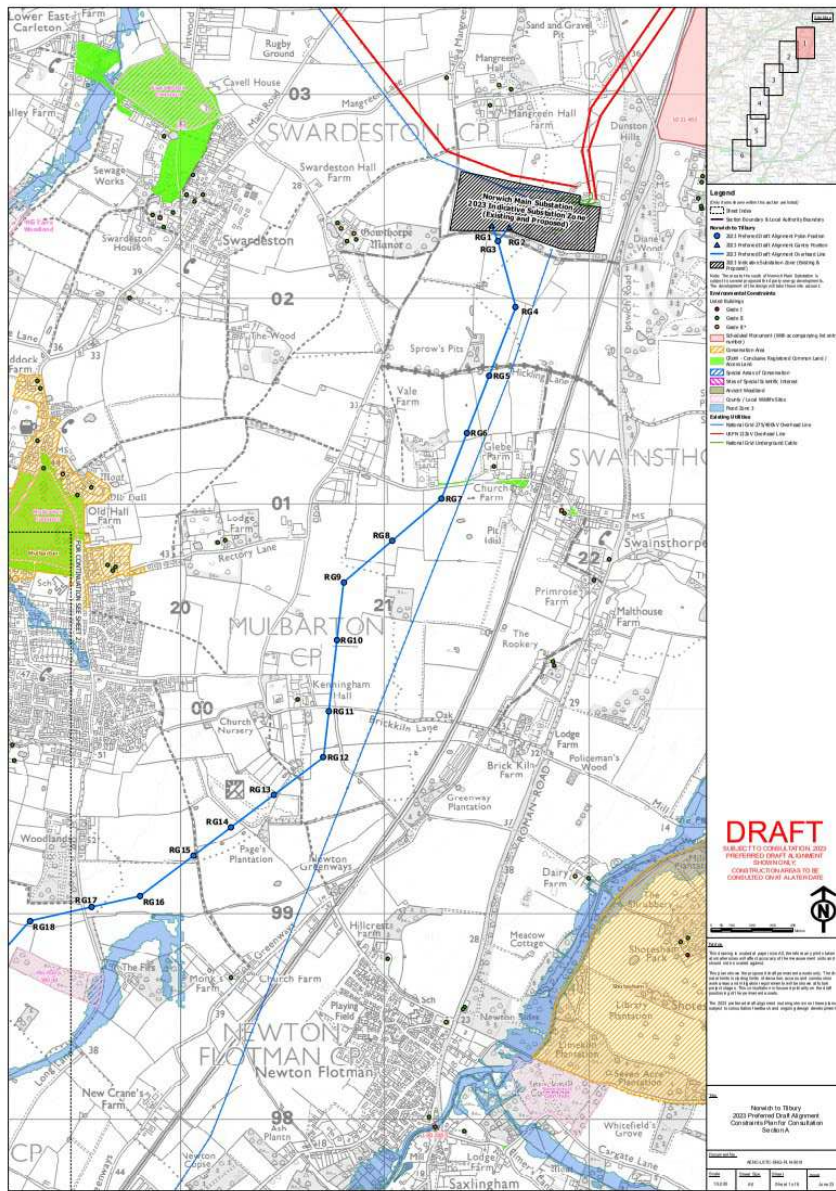
Planning and Highway Delegations Committee

Appendix 1

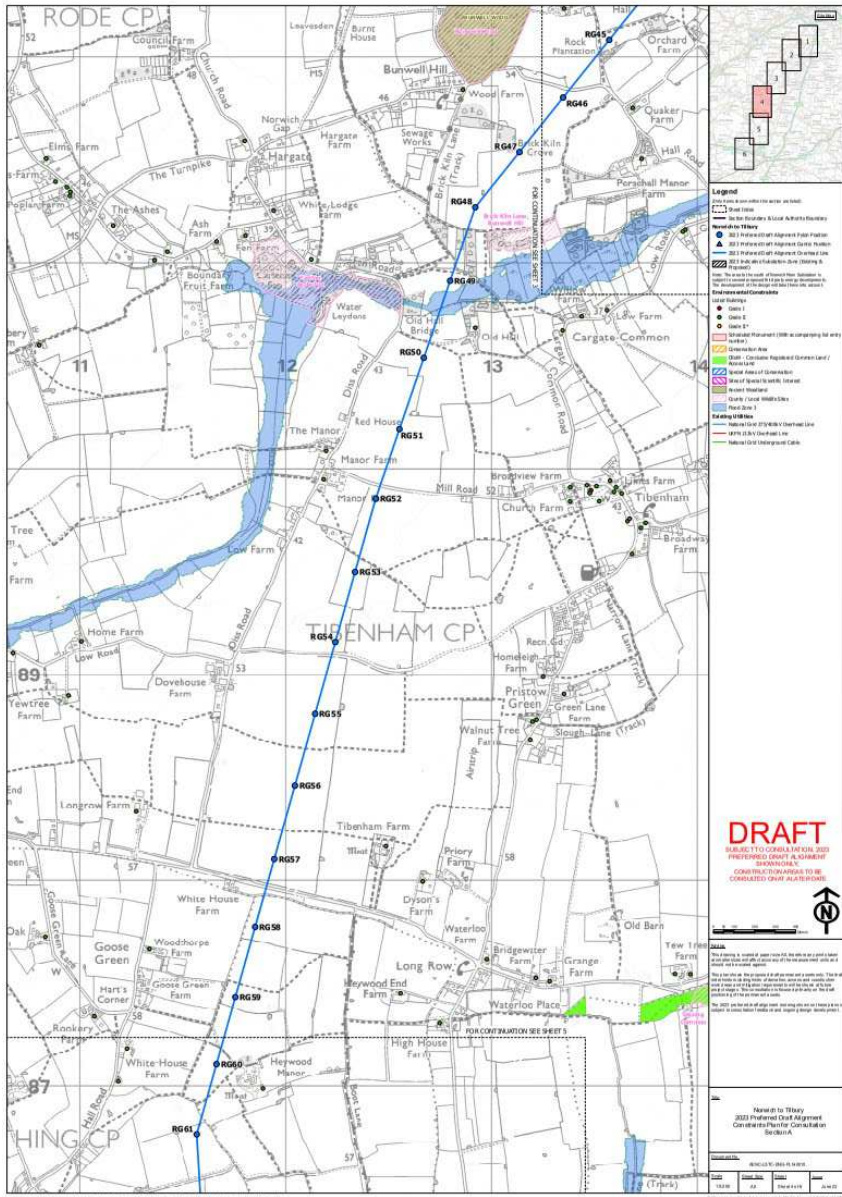
Proposed Route Alignment in Norfolk (part)

Maps taken from National Grid Website with permission

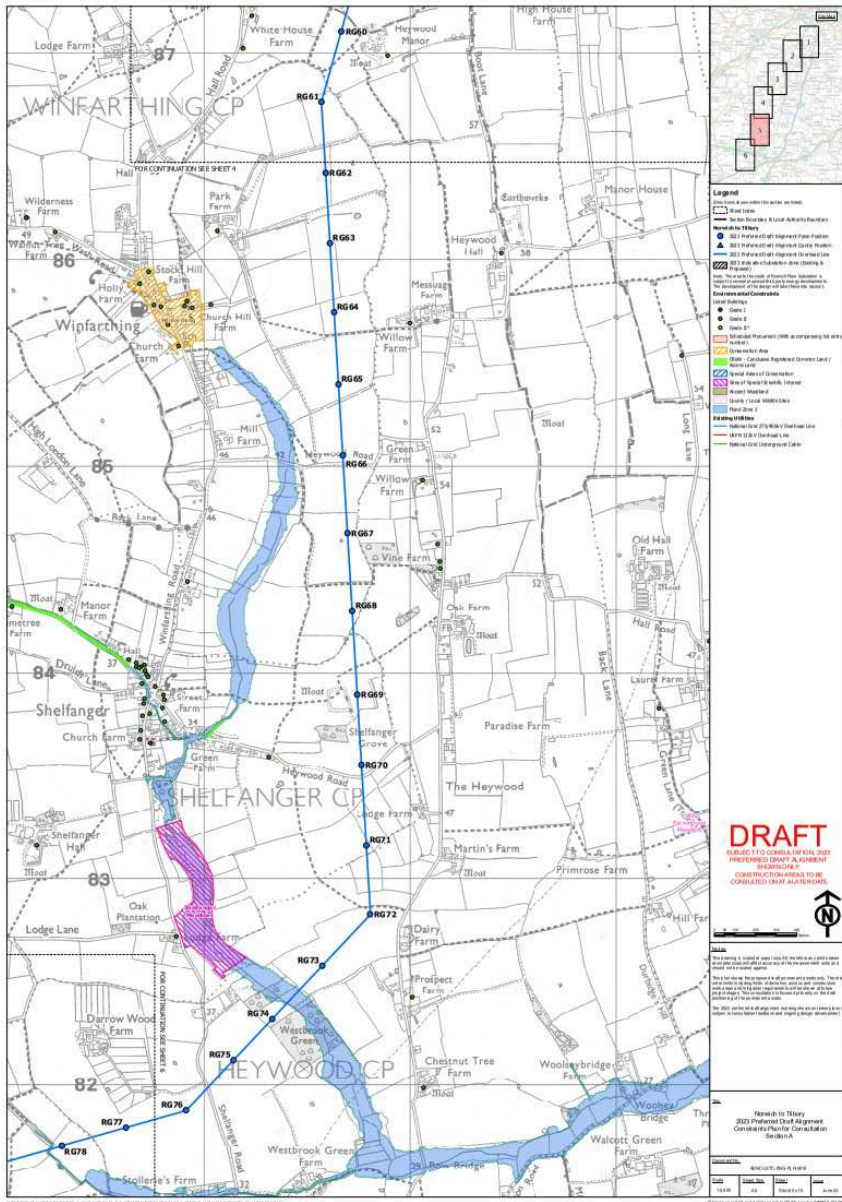
Map 1



Map 4



Map 5



Planning and Highway Delegations Committee

Appendix 2

Detailed Comments on the proposed Route Alignment

1. Introduction

- 1.1 The detailed 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 more detailed and further comments during the formal statutory consultation stages. These comments are based on previous comments made and have been updated to reflect more recent guidance and/or draft guidance from Government.
- 1.2 It should be noted that County Council officers sit on the various thematic technical group set up by National Grid to take forward the Development Consent Order; and supporting evidence needed in the Environmental Statement.

2. Strategic Overview - Comments

- 2.1 **De-carbonisation of the grid** - The County Council recognises 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. This is consistent with meeting the Government's: (a) plans to increase energy from offshore wind to 40 GW by 2030, which would be enough to power every home in the UK with clean energy; and (b) achieving Net Zero emissions by 2050. As such the County Council acknowledges the need for additional infrastructure to meet these sustainable objectives
- 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; and
- (c) take into account recent consultation work undertaken by DESNZ on: Community benefits for electricity transmission network infrastructure (March 2023) ([Community benefits for electricity transmission network infrastructure - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/community-benefits-for-electricity-transmission-network-infrastructure)) and the outcomes of this exercise.

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 National Policy Statement (NPS) for Electricity Networks Infrastructure (EN-5) published by the Department of Energy and Climate Change (2011); and emerging advice in the Draft NPS EN-5. In particular National Grid 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.

In addition National Grid will need to take into account draft advice on [Planning for new energy infrastructure: review of energy National Policy Statements - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/planning-for-new-energy-infrastructure-review-of-energy-national-policy-statements)

(2) Arboriculture

- 3.2 The comments below 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 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 ([ArcGIS Web Application](#)) which are used to help inform design before the detailed design stage.
- 3.4 BS 5837 - At the more detailed design stage trees that may be impacted by the scheme delivery (including access routes and siting of work and storage

compounds) must be considered in line with BS 5837 (2012) – Trees in Relation to Design, Demolition and Construction. It is expected that BS537 will form part of an iterative design process and influence design, layout and construction. Access tracks, working and storage areas must be included within the scope of this assessment as there is the potential for this aspect of project delivery to have a significant impact on trees that area suitable for retention.

(3) Ecology

Route Corridor Selection Process

- 3.5 Having reviewed the Corridor & Preliminary Routeing & Siting Study Report (April 2022) and Appendix A (Norwich to Bramford Topic Baseline Overviews), it is noted that the preferred route (Option NB1) has been selected out of an initial seven corridors assessed.
- 3.6 All route corridor options appear to have potential direct and/ or indirect effects on International, National and Local Designated Sites, as well as Ancient Woodlands and Priority Habitats. It should be noted that in section 4.5.5 of the Study Report, the preferred Option NB1 was considered to perform less well due to the proximity to Norfolk Valley Fens SAC/ Flordon Common SSSI. As stated in section 4.5.3, a Habitats Regulations Assessment (HRA) is likely to be required should option NB1 be selected as the preferred route corridor.
- 3.7 The submission of the 2023 Preferred Draft Alignment Constraints Plan (June 2023) is welcomed which now includes the locations of all locally designated County Wildlife Sites (CWS), along with other relevant environmental constraints, noting that these CWS had not previously been included in the 2022 Ecology/ biodiversity Topic Baseline Overview (Appendix A).
- 3.8 The inclusion of the proposed locations of pylons, overhead lines, substations etc. is helpful, noting that direct impacts to statutory and non-statutory wildlife sites, as well as areas of ancient woodland, appear to have been avoided in the submitted proposals.
- 3.9 It is noted in the Design Development Report (June 2023) that the only change outside the 2022 preferred draft corridor in Norfolk relates to an alternative corridor diverting from the crossing of the A1066 to pass to the east of Wortham Ling.
- 3.10 The assessment of baseline conditions (section 4.3.13) is welcomed, noting that there have been no new biodiversity designations identified since the 2022 consultation.
- 3.11 The Description of the 2023 Preferred Draft Alignment (section 6.4) is helpful; it is important to note that several direct impacts to woodland, tree belts and trees are identified here, for example between Norwich substation and Hapton (section 6.4.6), between RG49 and RG50 (section 6.4.11) and between RG89 and RG90 (section 6.4.22).

- 3.12 Ecological Survey Requirements - Following selection of a preferred corridor option, a full ecological assessment should be carried out, including both a Preliminary Ecological Assessment (PEA) and additional detailed specialist surveys as required. It is also important that any desk study should include the collation of all relevant habitat and species data from the Norfolk Biodiversity Information Service (NBIS), including all Local Wildlife Site information. All surveys carried out will require to be up to date, therefore given the potential timescales involved with such a scheme, it may be necessary to carry out regular surveys throughout the course of the design stage to ensure all surveys are no more than 18 months old.
- 3.13 Ecological Reporting - The scheme will need to consider all ecological effects, both during construction and in-operation (e.g. bird collision risk etc). The scheme should adhere to the ecological mitigation hierarchy and avoid impacts in the first instance. Where impacts cannot be avoided, mitigation measures will need to be identified, and compensation provided. Impacts to Irreplaceable Habitats (e.g. Ancient Woodland) should be fully avoided. In addition, the development will be expected to deliver a measurable Net Gain in Biodiversity (BNG) and contribute towards the Local Nature Recovery Network. Given the scale of proposed development and length of route through three Counties, any BNG works needs to be taken forward in a strategic joined-up manner having regard to each authorities' priorities.

(4) Landscape

- 3.14 A full Landscape and Visual Impact Assessment should be undertaken, including where necessary a Townscape Assessment. This should consider all potential impacts, both during construction and in-operation, and the cumulative impacts. **Ideally the whole of the route corridor should, from a landscape and visual impact point of view, be placed underground;**
- 3.15 Impacts on the Landscape Character and Visual Amenity should where possible be avoided this could be through consideration of fine tuning the route or looking at sensitive areas where undergrounding may be more suitable. Irreplaceable landscape features such as ancient woodland should be fully avoided.
- 3.16 Consideration should also be given to ways to minimise impacts; this could be through the use of **lower pylons** or pylons of an alternative design. Sometimes it may be suitable to embrace the visual appearance in the landscape and make the pylons a feature in themselves.
- 3.17 Cumulative impact should be avoided and National Grid should consider whether there are opportunities to reconfigure; rationalise or underground any existing electricity network infrastructure (in line with para 2.11.5 of the Draft NPS EN-5). This is a particular issue in Diss where there are existing 400 kV electricity transmission lines to the East of the town; and

the proposal outlined by national Grid would see further 400 kV lines to the West;

- 3.18 Where impacts cannot be avoided than **mitigation measures** will need to be identified. Whilst 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.
- 3.19 **Undergrounding** –In addition to the comments set out in the main report consideration should be undertaken of other places where refinement and potentially undergrounding is needed in order to avoid impacts in the surrounding landscape. These include, for example:
- (a) designations such as SSSIs/SACs (such as Flordon Common/Norfolk Valley SAC), Registered Parks and Gardens (e.g. Rainthorpe Hall),
 - (b) Sites of important historical context (e.g. Tibenham Airfield, Diss Conservation Area, Listed Buildings) Ancient Woodland (e.g. Bunwell Wood), County Wildlife Sites (e.g. Royden Fen).

(5) Archaeology

- 3.20 From the relatively limited contact the archaeological team have had with National Grid it is clear that they are well aware that undergrounding any sections of the scheme would increase potential impacts on below-ground archaeological remains by several orders of magnitude, with attendant impacts on timetables and costs.
- 3.21 It is understood that an archaeological consultant working on behalf of National Grid has 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.
- 3.22 Consideration should also 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.
- 3.23 At this stage the Historic Environment team have not had the opportunity to assess the proposed alignment and location of pylons in detail given the short timescale to respond. However, the location of a number of the pylons would require further information from the applicant in order to assess possible below-ground archaeology. The County Council would need to have sight of the archaeological desk-based assessment completed as part of the EIA process before considering next steps, which could include a targeted geophysical survey to inform micro-siting of pylons or pre-construction mitigation.

(6) Public Rights of Way (PRoW)

3.24 Given the scale of the project covering around 30 km within Norfolk; and the relatively short timescale to comment on the draft route alignment, it has not been possible for the County Council's PRoW team to undertake any detailed assessment of the route at this stage. The team would, however, recommend that the applicant 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 proposals are still at a very early stage and accordingly the applicants do not appear to be at a point where they can supply sufficient detail to undertake a full highway assessment. At this stage I would simply ask that the applicants take the following into account:

4.2 Roads that will be crossed and impacted upon by the cable route need to be assessed. The scope of the assessment needs to be agreed with the appropriate highway authority. In highway and transport terms, the following factors need to be considered:

- The method for crossing the highway must be agreed in advance with the highway authority
- Access points to any potential section of overhead line (OHL)
- Location for temporary accesses and Temporary Construction Compounds, storage and laydown areas;
- location of any Potential permanent accesses.

4.3 Assessment for the above 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 At this stage ahead of any detailed Environmental Statement the County Council as Minerals and Waste Planning Authority does not have any substantive comments to make on the preferred corridor regarding minerals and waste planning policy. This is largely because the proposed infrastructure in Norfolk would consist of overhead powerlines and pylon towers and the preferred corridor route only contains sparse isolated areas of safeguarded sand and gravel resources.

6. Norfolk County Council – Public Health Impact

6.1 The County Council would expect as part of any formal submission of the Development Consent Order (DCO), a Health Impact Assessment to form part of the supporting Environmental Statement (ES).

6.2 The UK Health Security Agency guidance (formerly PHE) published guidance on Electric and magnetic fields: health effects of exposure in July 2013. This states, *inter alia*, 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.”

6.3 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.

6.4 The precautionary principle would support ensuring the preferred route of the proposed new 400 KV overhead power lines avoid schools (see Children's Services comments below).

7. Service Provider Comments and wider Opportunities

(a) Children' Services

7.1 As a general principle the County Council as Education Authority considers that any proposed route should not pass directly over a school building or associated playing fields or be located in close proximity of any schools. It is understood that the preferred route corridor does pass close to two primary schools at: Hapton; and Winfarthing.

(b) Norfolk Fire and Rescue

7.2 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 East Anglia Green 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.

(c) Economic Development and Skills

7.3 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.

7.4 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 The LLFA notes the current documentation provided shows very limited consideration in relation to flood risk. While the development may have a minimal physical footprint, it should not lead to the exclusion of flood risk from the constraints to be considered.

8.2 Overarching National Policy Statement for Energy (EN-1) clearly indicates that Flood risk is a 'generic impact' that requires consideration on all energy projects. While Section 5.7 of EN1 states that *"Although flooding cannot be wholly prevented, its adverse impacts can be avoided or reduced through good planning and management."* However, no high-level consideration is currently demonstrated in relation to this project at this time.

8.3 Some further consideration of all sources of flood risk would need to be provided in the route selection process for both the temporary and permanent works proposed to be included within the scheme.

9. Local Member Comments

9.1 The local County Councillor for West Depwade (Catherine Rowett) has made the following comments:

9.2 I would like to confirm that I am in agreement with the main thrust of the main Report, with the preference for an offshore system of distribution to avoid overland routes, and then in order of priority a preference for underground cables, or for much more of the cable to be underground especially in the Bressingham/Diss area, or for a realignment to the East of Diss along the line of the existing railway and current pylon route.

9.3 In addition, I would like to suggest that the option of making use of the heat emitted in transit be seriously considered, and that if an offshore route is impossible there should be serious consideration of adopting an underground cable, with cooling points chosen specifically to enable the benefits of free heating to be accessed along the route. The heat could, for instance, be offered to farmers/market gardeners for greenhouses to grow winter fruit and vegetables, and to schools, churches, care homes, or housing estates for heating systems, or potentially for generating additional power by converting the heat back to electric energy. Given that the heat loss represents a huge loss of energy on route, it seems important to capture it rather than emit it into the air from overhead cables (which is clearly an additional source of warming the atmosphere and should be avoided if there could be a saving in some other area of energy use).

9.4 Besides this, we should also emphasise the need to focus resource on enabling future energy needs to be met primarily within the local area where they are required, and the facilitation of community off-grid local renewable schemes, and demand reduction projects (in particular managing down the expectation that most journeys will be by private cars in the future and moving towards shared and public electric vehicles for mass transit). This is not primarily the task of National Grid (obviously, it is a political task and countrywide), but it is worth mentioning it since there are some aspects of the

modelling that National Grid will be doing, and some aspects of demand-management that they might also have influence over.

Previous Comments made by the County Council in June 2022:

- (a) Letter from the Leader to National Grid
- (b) Technical Officer-level Comments
- (c) Labour Group Comments

AP/MBC

13 June 2022

Tel: 01603 223201

Mr Simon Pepper
National Grid

Sent by email only: simon.pepper@nationalgrid.com

Dear Mr Pepper

Re: East Anglia Green - Preferred Route Corridor Consultation

Thank you for engaging with the County Council on the above consultation exercise.

The County Council fully recognise the need for clean sustainable energy supplies in order to meet the Government's plans to deliver net zero emissions by 2050; and that a key component in achieving this is to increase the offshore wind energy sector. It is understood that the current plans for increased capacity in the electricity network is being driven by the need to accommodate the offshore wind sector.

While supporting the offshore wind energy sector, the County Council do not consider current plans for an all new high-voltage (400 kv) over-head power line between Norwich Main to Tilbury in Essex is the appropriate solution.

The proposed cable route corridor as currently planned would have demonstrable impacts on local communities; businesses; and the precious Norfolk landscape. I have attached the comments of those local County Councillors whose constituents would be affected by the above route corridor proposal.

Therefore, the County Council would strongly urge National Grid and the Department of Business, Energy and Industrial Strategy (BEIS) to consider:

- (a) An offshore option – involving some form of offshore transmission network capable of delivering power direct from source to where it is most needed in London and the South-East;
- (b) Under-grounding option – in the event that the offshore solution is not feasible in the current timescales; every effort must be made to bury the proposed cables underground to avoid the damaging impacts on local communities in Norfolk; and
- (c) Upgrading the existing over-head power lines to increase capacity.

These alternatives options must be thoroughly explored and tested as part of the Government's national response to delivering safe, secure and sustainable energy supplies for the future.

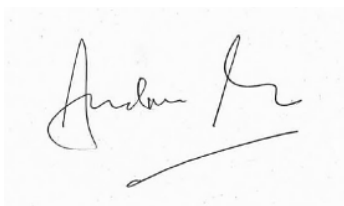
In addition, the wider potential opportunities and benefits for Norfolk must be taken into account by National Grid in order to ensure that there is accompanying investment in the transmission networks to provide power to meet the needs of existing and planned growth in this area, particularly along the Cambridge Norwich Tech Corridor.

Notwithstanding the above comments I have attached detailed officer-level comments in relation to the above route corridor proposal, which are made without prejudice to any further comments the County Council will want to make at the formal planning stages.

I have asked my officers to continue to work with yourselves (National Grid); and those other Local Authorities affected by this proposal to ensure the best outcome for the residents and businesses in Norfolk.

Should you have any queries on the above comments or those set out in the attached detailed officer-level comments, I would suggest you contact Stephen Faulkner (Principal Planner) or the named officers in the attached schedule.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andrew Proctor', with a long horizontal flourish underneath.

Cllr Andrew Proctor
Leader of the Council

c.c. Greg Hands MP Minister of State for Business, Energy and Clean Growth
Minister.Hands@beis.gov.uk
Cllr Bills and Duffin - Local Members
David.bills.cllr@norfolk.gov.uk
Barry.duffin.cllr@norfolk.gov.uk

Norfolk County Council Response to National Grid's Non-Statutory Consultation on: East Anglia Green Project

June 2022

1. Introduction

- 1.1 The technical officer-level comments below are made on a without prejudice basis and the County Council reserves the right to make further comments at subsequent stages in the planning process. The County Council welcomes the opportunity to comment on the proposals for a new 400 kv transmission line between Norwich Main and Tilbury in Essex; and recognises that at this stage the preferred route corridor is quite broad and does not show a precise route for any new transmission lines.
- 1.2 While this is largely a technical officer-level response, it should be noted that local County Council members along the route have been consulted by officers; and local member comments are set out below (section 9).
- 1.3 The County Council understands that the above project will be progressed as a Nationally Significant Infrastructure Project (NSIP) under the 2008 Planning Act; and that the final decision on any Development Consent Order (DCO) will be made by the Secretary of State (BEIS).

2. General – Overview

- 2.1 **Alternative Options** - While recognising the need to increase capacity to the electricity network, the County Council would strongly urge National Grid and the Department of Business, Energy and Industrial Strategy (BEIS), along with the Ofgem to consider:
 - An offshore option – involving some form of offshore transmission network capable of delivering power direct from source to where it is most needed in Essex; London, and the South-East;
 - Under-grounding option – in the event that the offshore solution is not feasible in the current timescales; every effort must be made to bury the proposed cables underground to avoid the damaging impacts on local communities in Norfolk.
- 2.2 In addition to the above National Grid will have to clearly demonstrate through their supporting evidence accompanying any DCO application that full consideration has been undertaken in relation to any network reinforcement options, which could comprise improvements or extensions to existing infrastructure rather than an entirely new line – in-line with National Policy

Statement (NPS) for Electricity Networks Infrastructure (EN-5) published by the Department of Energy and Climate Change (2011).

2.3 De-carbonisation of the grid - The County Council recognises 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. This is consistent with meeting the Government's: (a) plans to increase energy from offshore wind to 40 GW by 2030, which would be enough to power every home in the UK with clean energy; and (b) achieving Net Zero emissions by 2050. As such the County Council acknowledges the need for additional infrastructure to meet these sustainable objectives

2.4 Bringing Power into Norfolk - While acknowledging the wider strategic need for improving capacity to the existing electricity; the proposals set out by National Grid do not bring any direct or immediate benefit to Norfolk in terms of providing clean energy to existing or planned homes and businesses. There needs to significant accompanying investment in all the electricity transmission networks to address power shortages especially along the A 11 Corridor. Any proposals should support existing and planned growth at businesses in the area such as Lotus; and future growth along the Cambridge Norwich Tech Corridor (CNTC).

The County has significant planned housing and employment growth and as such consideration should be made by National Grid at this early stage in the NSIP process as to how Norfolk could potentially benefit from any new electricity infrastructure in terms of clean energy supplies;

National Grid need to actively engage with Norfolk County Council and other key stakeholders to explore how the above benefits for the County can be realised.

2.5 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.

2.6 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.

2.7 Should you have any queries with the above comments please contact Stephen Faulkner (Principal Planner – NSIP lead) email stephen.faulkner@norfolk.gov.uk

3. Natural Environment and Archaeology

(1) Over-arching Environmental Comments

3.1 The above proposal will need to follow the advice and guidance set out in National Policy Statement (NPS) for Electricity Networks Infrastructure (EN-5) published by the Department of Energy and Climate Change (2011); and emerging advice in the Draft NPS EN-5. In particular National Grid 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 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 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 ([ArcGIS Web Application](#)) which are used to help inform design before the detailed design stage.

3.4 BS 5837 - At the more detailed design stage trees that may be impacted by the scheme delivery (including access routes and siting of work and storage compounds) must be considered in line with BS 5837 (2012) – Trees in Relation to Design, Demolition and Construction. It is expected that BS537 will form part of an iterative design process and influence design, layout and construction.

- 3.5 Should you have any queries with the above comments please contact Tom Russell-Grant (Arboriculture and Woodland Officer)
tom.russellgrant@norfolk.gov.uk

(3) Ecology

Route Corridor Selection Process

- 3.6 Having reviewed the Corridor & Preliminary Routeing & Siting Study Report (April 2022) and Appendix A (Norwich to Bramford Topic Baseline Overviews), it is noted that the preferred route (Option NB1) has been selected out of an initial seven corridors assessed.
- 3.7 All route corridor options appear to have potential direct and/ or indirect effects on International, National and Local Designated Sites, as well as Ancient Woodlands and Priority Habitats. It should be noted that in section 4.5.5 of the Study Report, the preferred Option NB1 was considered to perform less well due to the proximity to Norfolk Valley Fens SAC/ Flordon Common SSSI. As stated in section 4.5.3, a Habitats Regulations Assessment (HRA) is likely to be required should option NB1 be selected as the preferred route corridor.
- 3.8 While the assessment process appears broadly acceptable in terms of taking account of environmental factors, it is of concern that Local Wildlife Sites which appear to be directly affected by Option NB1 are not identified within the Ecology/ biodiversity Topic Baseline Overview (Appendix A). For example, Hapton Common CWS, Norton's Wood CWS, Brock's Watering CWS, Brick Kiln Lane, Bunwell Hill CWS and Carlton Rode Fen CWS all appear to be within the corridor of NB1, yet are not referred to in the Main Risks, Constraints & Opportunities section (page A2).
- 3.9 Ecological Survey Requirements - The preferred route should be carefully refined, taking account of all relevant ecological impacts, including locally designated wildlife sites. It is also important that any desk study should include the collation of all relevant habitat and species data from the Norfolk Biodiversity Information Service (NBIS), including all Local Wildlife Site information. All surveys carried out will require to be up to date, therefore given the potential timescales involved with such a scheme, it may be necessary to carry out regular surveys throughout the course of the design stage to ensure all surveys are no more than 18 months old.
- 3.10 Ecological Reporting - The scheme will need to consider all ecological effects, both during construction and in-operation (e.g. bird collision risk etc). The scheme should adhere to the ecological mitigation hierarchy and avoid impacts in the first instance. Where impacts cannot be avoided, mitigation measures will need to be identified, and compensation provided. Impacts to

Irreplaceable Habitats (e.g. Ancient Woodland) should be fully avoided. In addition, the development will be expected to deliver a measurable Net Gain in Biodiversity and contribute towards the local Nature Recovery Network.

- 3.11 Should have any queries with the above ecological comments please contact James Fisher (Principal Ecologist) – Email james.fisher@norfolk.gov.uk

(4) Landscape

- 3.12 A full Landscape and Visual Impact Assessment should be undertaken, including where necessary a Townscape Assessment. This should consider all potential impacts, both during construction and in-operation, and the cumulative impacts. **Ideally the whole of the route corridor should, from a landscape and visual impact point of view, be placed underground;**
- 3.13 Impacts on the Landscape Character and Visual Amenity should where possible be avoided this could be through consideration of fine tuning the route or looking at sensitive areas where undergrounding may be more suitable. Irreplaceable landscape features such as ancient woodland should be fully avoided.
- 3.14 Consideration should also be given to ways to minimise impacts; this could be through the use of **lower pylons** or pylons of an alternative design. Sometimes it may be suitable to embrace the visual appearance in the landscape and make the pylons a feature in themselves.
- 3.15 Cumulative impact should be avoided and National Grid should consider whether there are opportunities to reconfigure; rationalise or underground any existing electricity network infrastructure (in line with para 2.11.5 of the Draft NPS EN-5);
- 3.16 Where impacts cannot be avoided than **mitigation measures** will need to be identified. Whilst 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.
- 3.17 **Undergrounding** – should be considered by National Grid where the route crosses the **Waveney Valley** and runs close to Bressingham Village and the nearby Steam Museum and Gardens. In landscape terms this is an unspoiled tranquil landscape which is more sensitive to infrastructure. In addition consideration should be undertaken of other places where route refinement and potentially undergrounding is needed in order to avoid impacts in the surrounding landscape. These include, for example:
- (a) designations such as SSSIs/SACs (such as Flordon Common/Norfolk Valley SAC), Registered Parks and Gardens (e.g. Rainthorpe Hall),
 - (b) Sites of important historical context (e.g. Tibenham Airfield, Diss Conservation Area, Listed Buildings) Ancient Woodland (e.g. Bunwell Wood), County Wildlife Sites (e.g. Royden Fen).

3.18 Should you have any queries with the above comments please contact Emily Smith (Principal Landscape Architect) emily.smith2@norfolk.gov.uk

(5) Archaeology

3.19 From the relatively limited contact the archaeological team have had with National Grid it is clear that they are well aware that undergrounding any sections of the scheme would increase potential impacts on below-ground archaeological remains by several orders of magnitude, with attendant impacts on timetables and costs.

3.20 It is understood that an archaeological consultant working on behalf of National Grid has 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.

3.21 Consideration should also 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.

3.22 Should you have any further queries please contact John Percival, Historic Environment Senior Officer (Strategy and Advice) Email john.percival@norfolk.gov.uk

4. Transport / Highways

4.1 The proposals are still at a very early stage and accordingly the applicants do not appear to be at a point where they can supply sufficient detail to undertake a full highway assessment. At this stage I would simply ask that the applicants take the following into account:

4.2 Roads that will be crossed and impacted upon by the cable route need to be assessed. The scope of the assessment needs to be agreed with the appropriate highway authority. In highway and transport terms, the following factors need to be considered:

- The method for crossing the highway must be agreed in advance with the highway authority
- Access points to any potential section of overhead line (OHL)
- Location for temporary accesses and Temporary Construction Compounds, storage and laydown areas;
- location of any Potential permanent accesses.

4.3 Assessment for the above 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

4.4 For further Information on highway related matters please contact John Shaw (Developer Services Manager) Email: John.R.Shaw@norfolk.gov.uk

5. Minerals and Waste

5.1 At this stage ahead of any detailed Environmental Statement the County Council as Minerals and Waste Planning Authority does not have any substantive comments to make on the preferred corridor regarding minerals and waste planning policy. This is largely because the proposed infrastructure in Norfolk would consist of overhead powerlines and pylon towers and the preferred corridor route only contains sparse isolated areas of safeguarded sand and gravel resources.

5.2 Should you have any queries on the above comments please contact Caroline Jeffery (Principal Planner – Minerals and Waste) – email caroline.jeffery@norfolk.gov.uk

6. Norfolk County Council – Public Health Impact

6.1 The County Council would expect as part of any formal submission of the Development Consent Order (DCO), a Health Impact Assessment to form part of the supporting Environmental Statement (ES).

6.2 The UK Health Security Agency guidance (formerly PHE) published guidance on Electric and magnetic fields: health effects of exposure in July 2013. This states, *inter alia*, 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.”

6.3 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.

6.4 The precautionary principle would support ensuring the preferred route of the proposed new 400 KV overhead power lines avoid schools (see Children’s Services comments below).

6.5 Should you have any queries with the above comments please contact Jane Locke (Prevention Policy Manager – Places) email jane.locke@norfolk.gov.uk

7. Service Provider Comments and wider Opportunities

(a) Children’ Services

7.1 As a general principle the County Council as Education Authority considers that any proposed route should not pass directly over a school building or associated playing fields, or be located in close proximity of any schools. It is understood that the preferred route corridor does pass close to two primary schools at: Hapton; and Winfarthing.

7.2 Should you have any queries with the above comments please contact Paul Harker (Place Planning Manager) email paul.harker@norfolk.gov.uk

(b) Norfolk Fire and Rescue

7.3 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 East Anglia Green 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.

7.4 Should you have any queries with the above comments please contact Tim Allison (Water Resources and Planning Manager) email tim.allison@norfolk.gov.uk

(c) Economic Development and Skills

7.5 The County Council would urge 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.

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 The LLFA notes the current documentation provided shows very limited consideration in relation to flood risk. While the development may have a minimal physical footprint, it should not lead to the exclusion of flood risk from the constraints to be considered.

8.2 Overarching National Policy Statement for Energy (EN-1) clearly indicates that Flood risk is a 'generic impact' that requires consideration on all energy projects. While Section 5.7 of EN1 states that *"Although flooding cannot be wholly prevented, its adverse impacts can be avoided or reduced through good planning and management."* However, no high-level consideration is currently demonstrated in relation to this project at this time.

8.3 Some further consideration of all sources of flood risk would need to be provided in the route selection process for both the temporary and permanent works proposed to be included within the scheme.

8.4 Should National Grid require any further guidance on the LLFA's expectations for information from applicants can be found at <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers>; or email llfa@norfolk.gov.uk

9. Local Member Comments

9.1 Cllr David Bills (Humbleyard Division) - *I, along with many other County Councillors, have received an email from Barford and Wrampingham Parish Council. This state their opposition to the proposed route and method of distributing the power via power lines to the London area. They make a very good case for Offshore Transmission network which I fully support. We must do all we can to protect the Norfolk countryside as once it is lost it cannot be*

replaced. Many areas have historic ties to them and again must be protected. I believe NCC should strongly object to the current proposal.

9.2 Cllr Barry Duffin (West Depwade) - *I would like to see Norfolk County Council take the hardest line possible, the proposed line of the pylons completely dissects West Depwade. . I have residents who are reduced to tears at the thought of their homes being ruined forever. Many of the properties will be permanently blighted by having power lines at the front and back, and whilst accepting you don't have a view unless you own it, it cannot be right to ruin such a huge swathe of South Norfolk for the benefit of getting power to Essex. The power is created in the North Sea and it seems to me to be only right and proper to continue the journey of the power via the North Sea to its destination. Failing that, if cables can be buried in Essex then there cannot be a good reason, and please don't suggest cost, as dozens and dozens of residents will pay a huge cost, as a reason to be above ground. This simply cannot and must not happen in the proposed manner, it will be ruin for a huge area of undoubted beauty of South Norfolk in general and West Depwade in particular. Bressingham gardens which is a nationally known attraction will have huge power cables strewn over it and what dangers does that constitute to the thousands of visitors that regularly come to South Norfolk.*



East Anglia Green – National Grid Consultation

Formal Response from the Labour Group at Norfolk County Council

Thursday 9th June 2022

Norfolk Labour County Councillors are deeply concerned by the National Grid East Anglia Green project and its impact on our county. We have considered the information provided by National Grid through its consultation portal and substantial feedback from residents, town and parish councils who have presented coherent arguments against the proposal.

We recognise and support the benefits that offshore energy production offers Norfolk. Projects that help our county move towards renewable energy sources are clearly welcome and our coastline has high prospects of creating clean energy for large swathes of our country. The green energy sector also brings benefits to the economy, although it remains to be seen if Norfolk's economic strategy will be robust enough to ensure Norfolk receives the highest dividend from offshore green investment.

We also recognise and support carbon neutrality and environmental targets for our county and country. The consultation fails to adequately evidence that the overall impact of this project will be carbon neutral, that our natural and historic environment will be unaffected and that quality of life for local residents will remain unchanged.

Bringing forward proposals of this nature, while the Offshore Transmission Network Review, set up by the Department for Business, Energy and Industrial Strategy, is yet to be concluded, is premature and appears to undermine the review. On conclusion of the review, which is due later this year, new legislation could be introduced which would override the basis of this project and cause it to be reworked from scratch. While we are not concerned in principle with the impact this would have on National Grid shareholders, we do believe this would bring uncertainty to the sector from an investment point of view and create risk for our economy.

In a motion submitted for debate to the Council meetings held on 29th November 2021, 28th March 2022 and 11th April 2022, Councillor Plant, Deputy Leader of Norfolk County Council, outlined further work that needed to be carried out by National Grid, on the implications of the various grid connection options and we support his calls.

In conclusion, Labour County Councillors do not support this proposal and will oppose the project.

Cllr Graham Plant
Deputy Leader
Norfolk County Council
County Hall
Martineau Lane
Norwich

Our Ref: GP/MBC

20 March 2023

Mr Simon Pepper
East Anglia Green
National Grid

Sent by email only: simon.pepper@nationalgrid.com

Dear Mr Pepper

East Anglia GREEN – Minimising impacts on the Waveney Valley

Norfolk and Suffolk County Councils have to date engaged separately with the East Anglia GREEN (EAG) project team. Officers of both Councils have, however, been engaged throughout the informal consultation stages on a range of technical and planning matters with EAG.

It remains the position of both the County Councils that the proposed onshore transmission option currently being pursued by National Grid should be avoided in favour of an integrated offshore alternative. Furthermore, in Norfolk we have indicated that in the event that the offshore solution is not feasible in the current timescales; every effort must be made to bury the proposed cables underground to avoid the damaging impacts on local communities.

Notwithstanding the above position, the two County Councils recognise the need to engage with the National Grid on a without prejudice basis to their preference for an offshore solution. The objective is to ensure that any adverse impacts on our communities, environment and the economy can be minimised or eliminated. In addition, Norfolk County Council is keen to explore the wider potential benefits, which could be achieved through being able to tap into the proposed new electricity transmission network.

The Councils have identified the Waveney Valley as an area of common interest, which we believe it is essential to express a joint position to secure the best outcomes for the communities and the environment of Norfolk and Suffolk.

The Councils consider that the Waveney Valley is of such significance, and that the likely adverse impact of the current proposals on it will be so great, that it is incumbent upon National Grid to deliver a more effective and less harmful scheme for this sensitive area.

The largely undeveloped nature of the landscape to the West of Diss means it is particularly sensitive. It has a combination of important ecological sites, local historic sites and landscape features. This area has important areas of public recreation; as well as significant visitor attraction at Bressingham, whose appeal is supported and bolstered by its landscape character and sense of place, which is likely to be significantly harmed by the proposed 400 kV power line.

Furthermore, the current proposals for an overhead route to the West of Diss will not only mean that 400 kV lines will surround the town, but that the new lines will interact adversely with UK Power Networks' 132 kV infrastructure, completing a web of overhead lines to the south of the town.

Finally, both to the north and south of Diss the current proposals appear likely to have adverse interactions on the operation and function of several airfields and airstrips, which need further consideration by National Grid to avoid significant impact on these businesses.

Therefore, given the above concerns the Councils consider that National Grid must undertake a detailed examination of the option of realignment of the route to the East of Diss and across the Waveney Valley, with a combination of overground and underground cable options. At the same time, opportunities to integrate the proposed transmission scheme with the existing distribution network (both 400 kV and 132 kV) should also be examined in detail.

The Councils request, that the findings of this work are published as part of the next consultation round, which is understood will take place around June/July 2023.

The Council's also consider that the findings of this work should be set out in the applicant's Preliminary Environmental Information Report (PEIR); and be submitted to the Examination as part of the Development Consent Order (DCO) application.

Yours sincerely

Cllr Graham Plant
Deputy Leader of the Council