

Objection – National Grid Norwich to Tilbury Pylon Proposals

Cllr Jessica Fleming, Hartismere Division, Suffolk

Contact: Jessica.fleming@suffolk.gov.uk

As County Councillor representing the Hartismere Division in Suffolk, I have received multiple communications from residents expressing their concerns, describing the harm that the project would inflict on themselves, their surroundings and ways of life, their freedom and their enjoyment. I have attended public meetings, public walks and examined the terrain involved in detail. It may be said that only those directly affected are concerned, however I can vouch that this is NOT the case. This is not a NIMBY issue. People from distant parishes are concerned and worried, people care about the quality of life in their local area, in the County and in the Country.

Both Norfolk and Suffolk County Councils object to the scheme as it stands as well as relevant district councils and MPs. Far preferable alternative options are available, but despite a commitment by National Grid to the contrary, they have not been part of the present consultation which appears as if it is ‘fait accompli’. All councils and anyone I have spoken to want a thorough, objective and properly costed assessment of all available options. I note the objection and recommendation made by Suffolk County Council (SCC) for a pause in the process to fully consider alternatives, and fully endorse this¹.

My objections fall under the following categories:

- Lack of Strategic Approach
- Cost/ Benefit Analysis
- Option Selection Process
- Local Amenity and Land
- Airspace
- Biodiversity, Natural Resources and Heritage

Lack of Strategic Approach

National Grid has been asked to arrive at a ‘preferred’ method of transmitting energy from North Sea wind farms to the area expected to have greatest demand (that is, London and the South East). Not unexpectedly, it has come up with the method that is most beneficial to its own interests and easiest to achieve in the (unnecessarily) short time period to which it has agreed.

This context has negated a strategic approach to the challenges of delivery. The [Strategic Environmental Assessment \(SEA\) Directive](#) advocates such an approach for major public plans and programmes including energy. While the directive itself was not transposed into UK law when we left the European Union, the principle remains sound that major plans and programmes be assessed at an early stage to identify strategic and cumulative issues that may otherwise be missed through a more ‘piecemeal’ approach, as well as reasonable alternatives. This kind of early stage objective assessment is weak or absent from the energy delivery programme at a high level and the effects are becoming apparent in real terms.

¹ Agenda item 8: [https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=\(21-05-2024\),%20The%20Cabinet](https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(21-05-2024),%20The%20Cabinet)

While the [Department for Energy Security and Net Zero](#) (DESNZ) has conducted SEA for offshore energy², it did not include the infrastructure necessary to transmit this energy nor has it done so for onshore 'renewable' energy (wind and solar in particular). The absence of a strategic approach to assessing firstly how to meet the 2050 net zero target (this commitment was not even debated in Parliament), and then the need for new onshore infrastructure to support decarbonising the grid has led to the present impasse we are experiencing with National Grid's proposals. It is not the only major conflict of interests emerging as the energy sector attempts to follow the current plans set out by DESNZ.

Responsibility for taking charge of the energy programme has been and remains confused. The relevant Department has changed its name and its priorities frequently (now DESNZ). The respective roles and responsibilities of National Grid Electricity Transmission (NGET), the Electricity Supply Operator (ESO), National Grid ESO (NGESO) and/ or the Independent System Operator and Planner (ISO - a new Government/ independent ? organisation) remain unclear. Neither is it clear how or whether they coordinate their work. This results in great difficulty for the public or anyone else in holding Government functionaries to account.

In summary, there has not been a transparent and objective approach by Government to analyse plans to undertake some of the most substantial changes ever contemplated affecting the UK countryside, biodiversity, people's homes and economic circumstances, and their health and wellbeing. It is within this context that National Grid has been asked to arrive at a 'preferred' method of transmitting energy from North Sea wind farms to the South East where high demand is anticipated.

Cost/ Benefit Analysis

Not unexpectedly, National Grid ET has come up with a cost appraisal method that appears to minimise consideration of local impacts: ESO stated in its Open Letter dated August 2023³ that: *The assessment of the options / alternatives will use the same criteria as utilised in the Holistic Network Design which includes cost to consumers; deliverability and operability; impact on the environment and impact on local communities.*

The manner in which National Grid has undertaken its costing comparisons has not been transparent, and despite requests, has not (to my knowledge) been provided to date. It is clear from the very small sums of money already being offered as compensation to 'affected landowners' that the real costs to people are not considerations. Costs for natural resource damages are not mentioned or it seems factored in at all.

The cost benefit approach in ESO's Options Study and as carried out by National Grid does NOT take into account the real costs to the public or to natural resources relating to enormous losses to visual amenity, habitat, values to homes and property, and loss of livelihood all of which are essentially permanent.

² <https://www.gov.uk/guidance/offshore-energy-strategic-environmental-assessment-sea-an-overview-of-the-sea-process#full-publication-update-history>

³ ESO: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.nationalgrideso.com/document/286066/download

Option Selection

The ESO announced in 2022 that it was undertaking an independent study into the co-ordination of the onshore and offshore network in East Anglia. The study would ‘*assess ways electricity can be transported from where it lands (from the relevant in scope windfarms and interconnectors) to where it is needed*’. The ESO in its open letter stated that it *will produce a final report that will be made publicly available for interested parties. This report will then be considered by National Grid Electricity Transmission as part of their ongoing development of the Norwich to Tilbury project ahead of the statutory consultation scheduled for 2024*⁴.

Although National Grid committed to review its proposals against the ESO Study outcomes, it clearly has not done so. The study results were published in March 2024 and described nine (or ten) potentially viable options, the consultation began shortly afterward, concluding on 26th July. The information provided in the consultation does not mention ESO Study options, which in any case given the timing could not realistically have taken place. On this basis the public consultation which is just concluding is fundamentally flawed.

The OffSet Group and area MPs have also argued that National Grid should wait until this work has been completed before progressing with the Norwich to Tilbury project.

While some of the options describe offshore or hybrid versions, one option describes a High Voltage Direct Current (HVDC) undergrounding option which could be undertaken the length of the route using condensed cable. The delivery date is around 2034, four years later than the target date of 2030. However a separate study commissioned on behalf of the three affected counties has concluded that offshore wind energy will not be ready for transmission until at least 2034⁵ which renders this option deliverable in terms of schedule and far preferable in areas of local and regional impact to the present alternating current over-ground option put forward. Given the manner in which costs are evaluated, the onshore above ground option incurs far higher real societal costs than the other (nine) potential options.

The costings prepared to support transmission option appraisal have not been made transparent to the public, and they do not represent the real costs to the public and environment. Therefore the options need to be re-evaluated using anticipated supply chain costs at a realistic delivery date, and real costs to the public rather than to National Grid.

Local Amenity and Land

Local issues include loss of amenity due to impairment of views, loss of house and land values, and effects on visual amenity. Some residents may have already quantified their losses to

⁴ ESO Open Letter: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.nationalgrideso.com/document/286066/download

⁵ Andy Hiorns, 2024: <https://www.suffolk.gov.uk/asset-library/n2t-the-hiorns-report.pdf>

National Grid, however many will not realise any loss for some time; others suffer the anxiety of fearing that their key asset is much less valuable than previously thought.

Real costs to the public cannot possibly be offset by token payments to landowners as National Grid is suggesting.

For many who rely on tourism for income, the blight of overhead pylons will curtail this activity and they will suffer substantial loss of income in the future which is not possible to quantify at the present time.

Losses related to land and home devaluation, lack of earnings dependant on natural surroundings, loss of airspace and anxiety and mental health are (1) not currently subject to compensation (other than a limited token initial land payment) (2) almost impossible to quantify at present, (3) permanent and (4) not considered as 'costs' by National Grid.

Airspace

Several operators of small aircraft, gliders and airfields have approached me. One such airfield is in my own division in Burgate, at Brook Farm. They would likely shut down if this project goes ahead, despite some adjustment based on earlier consultation which does not appear to be sufficient. Others are facing similar challenges. All airfields need to take into account potential engine failure, which is highlighted in the response from this operator made separately to you. Gliding aircraft are difficult to control and require significant safe airspace within which to operate. The restrictions of pylons are terminal for them.

During the public consultation I have asked National Grid representatives to be sent a map showing all flying operations in Suffolk and Norfolk and despite its being promised, this has not arrived. Such a map or plan was not available during the public consultation period and should have been.

Flight operations and airspace needs have not been fully considered in the proposals. National Grid does not appear to be aware of the locations of all small operators or to understand the need for wide airspace safety margins.

I am also concerned about effects of 50-m high pylons on military operations, several of which are centred in Suffolk or use Suffolk (and Norfolk) airspace. There was little to no information available to the public on this topic. Future defence needs are difficult to predict but should be fully accommodated in any new energy proposal.

Biodiversity, Natural Resources and Heritage

A strategic approach would enable areas of particular environmental importance to be fully addressed taking into account wider determinants such as biodiversity migration patterns and other external pressures (cumulative impacts). Instances of harm to bats and their flight paths, birds of prey and migratory birds are already emerging. Surveys are generally local, not regional nor cumulative; consideration should be given to all species and habitats formerly designated through EU legislation but now included in the UK Biodiversity Action Plan⁶.

Construction and maintenance of the pylons and related infrastructure would be highly destructive to multiple sensitive habitats, wetlands, trees, the Upper Waveney Valley fens and

⁶ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

special landscape area and locations too numerous to recount specifically here. As pressure on the countryside grows from development, any opportunity to avoid such destruction must be taken. The overground route is not essential to delivery of energy to its end point, viable options are available some with very little if any additional cost particularly if the costings were to be done correctly.

Another factor is one of indirect impacts from the likelihood of an overground pylon system enabling additional large scale solar farm developments along its path. This factor should be considered as a negative feature of the above ground scheme as it has potential to result in further loss and change in habitat with unknown consequences, loss of farm land, changes in land use and industrialisation.

There is no indication from National Grid's scoping documents that a strategic approach to natural resource impact assessment has been taken. Cumulative and indirect impacts of this project along with the multiple others contemplated under the national energy /net zero delivery approach are absent. This is inadequate. Under-estimating the value, role and inter-relationships of natural habitat will lead to progressive biodiversity loss over time contrary to the objectives of Biodiversity Net Gain⁷ and other laws.

Landscape and visual resources would be permanently altered if the over-ground option is implemented with related loss of tranquillity and amenity, as would ancient field patterns and the setting of historic buildings.

Industrialisation of the rural landscape on the scale proposed with the above ground option would result in significant lasting harm to biodiversity, the historic environment and rural landscape; this kind of damage is not costed, but also not possible to mitigate.

⁷ <https://www.gov.uk/government/collections/biodiversity-net-gain>