

To: contact@n-t.nationalgrid.com

DPC's objection to the strategic proposal for Norwich to Tilbury

Dedham Parish Council (DPC) consider that there is insufficient information in the 2024 statutory consultation documents to be certain about how much additional electricity transmission capacity is required in the South East, and by what date, to fully evidence a strategic proposal that relies on onshore reinforcement technology, which includes the construction of overhead lines (OHL) and pylons, and a programme delivery date of 2030. DPC must therefore maintain its principal objection to Norwich to Tilbury on the following grounds, which are discussed in more detail below:

- **Object to the lack of evidence provided by National Grid Energy Transmission (NGET) to support the need and timing of Norwich to Tilbury by 2030.**
- **Object to NGET undertaking an accelerated programme of consultation to meet an uncertain 2030 programme delivery date on what DPC considers to be a predetermined strategic proposal and 2024 preferred route using predominately harmful onshore overhead line (OHL) and pylon technology, and prior to the conclusion of the Offshore Coordination Support Scheme (OCSS) and conscious consideration of ESO East Anglia Study Report (March 2024).**

DPC welcomed further information that supported greater transparency on the assessment of need for additional electricity transmission capacity in the east, and the appraisal of strategic options to meet this need was provided in the Design Development Report (June 2023) and Strategic Options Back Check and Review (June 2023). DPC understands that this work was undertaken by NGET prior to the first round of non-statutory consultation in 2022 and informed by National Grid Electricity Systems Operator's (ESO) assessment of future transmission requirements and network capability, as detailed in the 10 Year Electricity Statement 2022 and refreshed Network Option Assessment 2021/22 (NOA). DPC notes in paragraph 4.2.5 of the Design Development Report (April 2024) that the Strategic Options Back Check and Review (April 2024) remains materially unchanged from the 2023 iteration.

DPC maintain that there are significant uncertainties and sensitivities concerning the need and timing of Norwich to Tilbury that would have been evident to NGET and ESO during the appraisal of strategic options and choice of strategic proposal in 2022, and that these still remain in 2024. This is a position is further supported by Hiorns Smart Energy Network Report (November 2023) and the ESO's East Anglia Study Report (March 2024).

In considering its in principle objection to Norwich to Tilbury, DPC accepts that NGET has reviewed the strategic proposal and 2024 preferred route against the new national policy statements for energy that were published in November 2023, and its existing connection contracts. DPC understands that NGET has contracts with offshore wind developers at North Falls and Five Estuaries, and with Tarchon Energy for an interconnector with Germany that require connection at the proposed new East Anglia Connection Node substation in Tendring by 2030. DPC do not consider that NGET have provided any new evidence in its 2024 statutory consultation to refute the conclusion of the Hiorns Report that Norwich to Tilbury is not needed by 2030. DPC would also continue to challenge ESO's

assumption that 100% of contracted projects in the South East will be successfully awarded Contract for Difference and require connection to the network by this date.

However, it is not clear beyond the existence of these contracts why Norwich to Tilbury was included in the government's Accelerated Strategic Transmission Investment (ASTI), which then made it out of scope for Holistic Network Design (HND) as part of the Offshore Transmission Network Review (OTNR). DPC remains concerned that Norwich to Tilbury has been scoped out of HND and into the OTNR Early Opportunities workstream without reasonable justification. DPC can find no mention of this issue in the 2024 statutory consultation, despite it being raised in the previous 2nd round of non-statutory consultation.

DPC are concerned that NGET have proceeded with statutory consultation on a strategic proposal and 2024 preferred route for Norwich to Tilbury prior to any meaningful outcome from the Offshore Coordination Support Scheme (OCSS), which includes the proposed offshore wind developments at North Falls and Five Estuaries. There is very little information available on Early Opportunities, including the OCSS, but DPC is aware how complex contractually the coordination of North Falls, Five Estuaries and Sea Link would be. Nevertheless, in the absence of any meaningful output from OCSS being available, DPC can only conclude that NGET cannot have conscientiously considered the ESO's East Anglia Study Report (March 2024).

It remains unclear how ESO can be considering network options for electricity transmission in the south east that are based on the premise that OCSS will conclude with the successful coordination of North Falls and Five Estuaries connecting into the proposed offshore electricity transmission infrastructure provided by Sea Link, whilst in parallel NGET are continuing with promoting a network option and preferred route for onshore electricity transmission infrastructure in the south east that it argues is needed to support connection contracts with North Falls and Five Estuaries by 2030. This further adds to the concerns of DPC that the strategic option and choice of strategic proposal has been predetermined and will remain an example of the uncoordinated and inefficient approach to energy transmission that the government accepts requires urgent improvement and is currently reviewing.

- **DPC wishes to reiterate that its preferred strategic option for Norwich to Tilbury remains an integrated offshore technology that minimises onshore transmission infrastructure and does not include OHLs and pylons.**
- **If an offshore approach is not possible an onshore HVDC fully undergrounded approach as is set out in the ESO East Anglia Study Report (2024) should be the next option tabled as it is clearly less visually damaging than the tabled scheme.**

DPC recognises that this option would need to be delivered at pace and without risk to national net zero, renewable energy and decarbonisation targets, and energy security.

If the strategic proposal for Norwich to Tilbury were to retain the current onshore option, DPC considers that further assessment and likely significant changes are required as noted in the main body of the report below.

The 2024 consultation contains very little information on how NGET will ensure that benefits from Norwich to Tilbury, both direct and indirect, are maximised from all possible sources. DPC expects the vital role that Essex and its local communities are expected to have in hosting nationally significant onshore transmission infrastructure, which supports the delivery of cheaper, more secure, and low carbon energy generation, to be recognised. Material and demonstrable benefits in mitigation need to be provided for the host communities.

Removal of the proposed East Anglian Connection Node (EACN) Substation

The OCCS would potentially remove the need for the EACN. The recent ESO East Anglia Network Study report of March 2024 contained a number of options that did not require the EACN – for example option 5b. None of the options were cut and dry ‘winners’ and none had the limited impact of an entirely offshore proposal, but they demonstrate that there are alternative options that are workable that do not require the impact on our neighbours at Tendring District Council (TDC) and on the DPC area that any proposal with the EACN would have.

An option that removes the EACN would be very much supported from DPC’s point of view as it is the EACN that results in an alignment that impacts upon the Dedham Vale National Landscape (formerly AONB). The Council’s position is that the removal of the EACN should be prioritised. DPC note a sense of the Norwich to Tilbury scheme sleepwalking into a DCO that contains the EACN which in turn will ensure it happens, whereas there appears to be ample scope for offshore windfarm coordination that may potentially remove the need for it.

That leaves Tarchon. It is unclear as to whether the Tarchon interconnector will ever transpire regardless of its Holland Haven landing area licence. The Tarchon interconnector does not have a DCO for landfall nor for cabling across the TDC area. Whilst further along the process, neither do the North Falls or Five Estuaries Windfarms.

This adds further weight to DPC’s opinion that an alignment that removed the EACN should be prioritised.

The Alignment to/from the EACN

Notwithstanding DPC’s position that it should be removed, if the EACN remains, the Council strongly recommends the undergrounding of the section between the EACN and what is currently the position of the Great Horkesley Cable Sealing End Compound (CSEC).

It appears perverse to take underground cables into the EACN from the Dedham Vale National Landscape on the way into the EACN, only to then erect pylons above the trenched cables on the way out of the EACN, to then trench the cables at Great Horkesley.

This approach results in the destruction associated with the construction of the trenched section, without the visual amenity benefits as pylons and then introduced above ground.

DPC acknowledges that part of this section occurs in neighbouring Tendring District Council but see no obvious disadvantage to a ‘trench into EACN/trench out of EACN’ strategy, even if this widens the construction swathe somewhat.

This matter is addressed in the Design Development Document at 5.4.121 where you state:

Feedback from various respondents requested the proposed overhead line be replaced by the use of underground cable between the EACN substation and the Great Horkesley underground cable section. This area is not subject to designations that change the presumed general acceptability of overhead lines (as set out in EN-5) although the overhead alignment is relatively close to the Dedham Vale Natural Landscape (AONB). However, whilst potentially visible from locations within the AONB it is not considered that this would lead to effects that would justify, in policy terms, the very substantial additional costs and environmental effects arising from the installation of underground cable.

DPC does not concur with this approach and considers that even if the additional cost is substantial, it is a price worth paying, noting that it would negate the need for the Great Horkesley CSEC in its entirety and the environmental and visual benefits that brings. Material harm to the designation occurs from development within its setting and not simply from development within the designated area. This harm must be avoided by undergrounding.

The effect on Dedham Vale

Given the extant National Policy Statement EN5 and the significant impacts on the Dedham Vale and its setting, National Grid risks facing Judicial Review if they fail to avoid even residual impact on the Dedham Vale. National Grid must therefore modify their proposals in three key regards: (1) identifying an alternative site for the East Anglia Connection Node (EACN) substation that minimises harm to sensitive areas; (2) removing all pylons visible from or obstructing views into the Dedham Vale after changing the EACN location, making use of underground cable throughout the section to at least TB41/42 instead; (3) remove the Sealing End Compounds to locations which do not impact view in to or out from the Dedham Vale and also provide adequate screening to / from settlements and Listed Buildings.

The Need for additional consultation

A running theme throughout is the significant amount of information that is missing from the consultation which in turn has been justified as 'this will be provided in the Environmental Statement (ES)'. In short numerous topics will be bolstered at ES stage. This undermines the usefulness of the Statutory Consultation as a tool for a genuine consultation.

It is therefore requested that once this additional information is derived from the additional survey work that is currently ongoing and will continue to be ongoing throughout the rest of 2024, then a further additional statutory consultation is undertaken to enable a useful response from LPA's.

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Dedham Parish Council

July 2024