

9 September 2024

RIIOElectricityTransmission@ofgem.gov.uk

Dear Sirs

Statutory consultation on Norwich to Tilbury Early Construction Funding application and corresponding proposed modification to Special Condition 3.41 of NGET's electricity transmission licence

I am writing on behalf of the Suffolk Preservation Society (SPS) to object to the proposals to release funding to facilitate early construction activities to accelerate the Norwich to Tilbury project.

SPS campaigns on important issues affecting the county's landscape and heritage, working constructively with local communities, campaign groups, the local planning authorities and other stakeholders to help achieve better outcomes for our historic natural and built environment. The Society also represents CPRE, The Countryside Charity, in Suffolk.

SPS position on the Norwich to Tilbury scheme

SPS considers that the Norwich to Tilbury line should be paused for review whilst need, timings and alternative solutions are investigated more thoroughly. Our concerns about the lack of well thought through policies and joined up thinking around National Grid's Great Grid Upgrade (GGU) led the Suffolk Preservation Society (along with Essex and Norfolk branches of the CPRE) to commission the 2024 *Greening the Great Grid Upgrade* report¹.

The report, by Dr Andy Tickle, an independent planning and campaign consultant who has worked on energy, planning and environmental issues for over 40 years, provides a detailed critique of the GGU's strengths and weaknesses and how it might be improved to reduce the impacts on the countryside and ensure that impacted communities are properly heard. SPS endorses the findings and recommendations of the report which concludes that **National Grid is hurrying ahead too fast with its plans, risking a legacy of individual projects that may be surplus to energy requirements, do not integrate with each other, fail to maximise their full environmental benefits and marginalise affected communities.**

In particular, and of direct relevance to this consultation, the report recommends that the Norwich to Tilbury scheme is halted to properly investigate the various offshore and underground solutions proposed by expert bodies and campaign groups, especially in light of evidence that the costs associated with such schemes and the urgency of the proposed connection have been overestimated.

¹ <https://www.suffolksociety.org/wp-content/uploads/2024/05/Greening-the-Great-Grid-Upgrade.pdf>

An independent expert needs case analysis carried out in September 2023 by Andy Hiorns, a former senior NGET expert, for Essex, Norfolk and Suffolk county councils - ***The Hiorns Report***²- exposes serious holes in the needs case for this major overhead line, citing overestimation of the urgency of connection. Overall, the review conclusions are damning, with Hiorns stating that *given the current levels of uncertainty over generation project delivery – it is premature to conclude that N2T represents the best solution in meeting future system needs and that further sensitivity studies are required to reduce the risk of stranded investments*. The review also states that a delay (for further studies) would not hinder the delivery of ongoing and planned offshore wind projects. In addition, the 2024 *ESO East Anglia network study* shows that a HVDC underground line from Norwich to Tilbury is another viable alternative.

Conclusion

SPS endorses the conclusions from these reports and calls for the Norwich to Tilbury line to be paused for review whilst need, timings and alternative solutions are investigated more thoroughly.

SPS therefore strongly object to Ofgem's minded-to position to provide Early Construction Funding for the Norwich to Tilbury project. We consider that funding and carrying out facilitation works to this scheme pre-empts the proper planning process and risks creating infrastructure which is surplus to requirements.

Yours sincerely

Fiona Cairns IHBC MRTPI
Director

Cc: James Cartlidge MP
Adrian Ramsay MP
Robert Townshend Chairman, SPS

² <https://www.suffolk.gov.uk/asset-library/n2t-the-hiorns-report.pdf>