

James Cartlidge MP - Interested Party Reference number: F9D2031EC

I am responding as the MP for South Suffolk to the Planning Inspectorate's call for written representations regarding National Grid's Norwich to Tilbury proposals, in line with Deadline 1. Firstly, for the avoidance of any doubt, I am not against new electricity transmission infrastructure. On the contrary, I am strongly in favour of delivering new infrastructure, but through the underground HVDC option. In that context, I am against this proposal from National Grid for 180km of pylons running from Norwich to Tilbury, for the following key reasons:

1) Pylons are not the only option

We know that pylons are not the only option for East Anglia. In March 2024, National Grid ESO (now NESO) published their East Anglia Study which assessed different electricity network configuration options that transferred power across the region. The study found that underground HVDC (U-DC) was the cheapest option with the baseline comparison date of 2034. Their senior technicians even re-ran the figures to ensure their accuracy.

2) Not consulted on other options

Throughout the non-statutory and statutory consultation stages with National Grid, my constituents were not consulted on all of the other transmission options i.e. offshore or underground routes, instead they were presented with a purple swathe of pylons across the countryside and were 'consulted' on whether the line should go over their field or the field next-door.

3) Challenging the pylon presumption

In Germany, the U-DC option is the legal default. Crucially, the last Government recognised this and confirmed in May 2024 – at the final Adjournment debate before dissolution – that it would urgently review the 'pylon presumption', in light of new facts from ESO showing the comparable cost competitiveness of U-DC.

4) The impact on local communities

I have been contacted by hundreds of constituents in South Suffolk who will be negatively impacted if this planning application were to be granted. From their enjoyment of the countryside to house prices, pylons would cause lasting visual harm and financial harm. Of course, I recognise that undergrounding does cause disruption but it's short term, and residents know that the land will be 'made good' after construction is complete. Pylons cause the permanent despoilment of our beautiful countryside, and we know that the AC underground cabling proposed in this application requires far wider trenching than U-DC.

I will expand on each of these points in turn in this representation but, as per my letter of 17th February, I would also like to take this opportunity to reiterate my request to speak at a future open floor hearing, and that one of the next hearings takes place in my constituency of South Suffolk. More than ten villages are affected by these proposals, and after being contacted by hundreds of my concerned constituents, I know how much residents would appreciate a hearing in their local area.

To take each point in turn, first, **pylons are not the only option for East Anglia**. After years of campaigning alongside my Suffolk, Essex and Norfolk MP colleagues for a thorough assessment of alternatives to pylons, ESO agreed to conduct a review of 10 different electricity network configuration options for East Anglia. The results were published in March 2024, with options ranging from the current pylon proposal to a network configuration involving no new overhead lines.

Most importantly, ESO found that undergrounded HVDC (U-DC) was cost comparable to pylons, assuming a 2034 baseline – indeed, potentially cheaper, given the greater efficiency of this option and therefore the significantly lower ‘constraint payments’ involved. I would stress that these findings were retested repeatedly by ESO’s senior engineers and found to be fully justified.

The ESO study concludes: “When combined with overall system impact, the onshore option ranks highest as it is deliverable earlier (in 2030), however if a later delivery of 2034 is assumed then the undergrounded HVDC option as well as hybrid onshore and offshore options are comparable in ranking”.

Given the above, some may say that pylons could be delivered more quickly, but it must be evident from the level of opposition that pylons would receive far more legal challenge, therefore also resulting in delay. In addition, ESO concluded that the underground onshore HVDC proposal is ‘technically feasible in the timescales that the capacity is needed’.

Whilst of course I accept that undergrounding still has short-term impact, with a single U-DC network for East Anglia (converting in the industrial hinterland of its primary demand hub, i.e., London), there isn’t the need to have such wide trenches as the more expensive AC undergrounding, and there would be far less impact than partial undergrounding between pylons. It also doesn’t involve the permanent scarring of our countryside, which I feel is so important to mitigate. I currently have a huge water pipe, similar in scale to a U-DC cabling project, being built through my constituency – it’s disruptive, but I’ve never received a single complaint because constituents know the rural impact will be ‘made good’.

Secondly, my constituents were **not consulted on other options**.

After attending National Grid's engagement sessions on their proposals, it became clear that my constituents were not being effectively consulted on all of the other transmission options i.e. offshore or underground routes, instead they were presented with a purple swathe of pylons across the countryside.

In fact, when my constituents raised the possibility of an offshore route instead, their suggestions were dismissed as 'impossible'. This is despite billions of pounds worth of investment in offshore cabling off Scotland and the North of England, namely the Western and Eastern Links, which surround the UK with vital offshore interconnectors carrying electricity within our nation, and internationally.

Ever since 'East Anglia GREEN/Norwich-Tilbury' was first proposed, National Grid have made not even the slightest attempt to look seriously at or consult on any alternative to pylons. This became apparent in a meeting with my MP colleagues, National Grid and Ofgem which took place on Monday 18th July 2022. The following day, led by Sir Bernard Jenkin MP, there was a Westminster Hall debate on New Pylons in East Anglia. As I said in the debate, National Grid's refusal to even consider alternatives to pylons was not based on any detailed, objective assessment of alternatives.

James Cartlidge MP: "National Grid said yesterday that given the concern about what is happening in Scotland and the sense of unfairness, it would publish a detailed assessment of an offshore option later in the summer. Why will that be published later in the summer? Because it has not been done. There has been no detailed assessment of an offshore option."

"How on earth did National Grid conclude that it cannot go offshore? ... I am pleased to say that the meeting was attended by Akshay Kaul, the director of networks at Ofgem. The argument from National Grid is that the framework precludes it from looking at an offshore option. The regulator, Mr Kaul, said that is not correct: the framework does not preclude looking at offshore options; all the infrastructure projects should be looked at on a case-by-case basis. That is what he said to us yesterday, very transparently. How can something be looked at on a case-by-case basis if the detailed work has not been done?"

Source: Hansard, New Pylons: East Anglia, Volume 718: debated on Tuesday 19 July 2022

The above extracts from my speech illustrate a key failure of National Grid's consultation, how could they have possibly consulted on any alternatives to pylons if they hadn't done the work.

Thirdly, **challenging the pylon presumption.**

Historically, overhead lines have been the strong starting presumption for electricity transmission infrastructure in the UK, primarily because of cost. However, as confirmed in May 2024 by the former Energy Minister, Justin Tomlinson, these costs are based on 2012 figures.

Minister Justin Tomlinson: *“...overhead cables being the strong starting presumption, which in simple terms is based on the cost, as per the electricity system operator’s 2012 figures. I am sure that the House would recognise that, since 2012, significant advances have been made to new technology. As has been mentioned, Germany has already made underground cables the default.”*

Source: *Hansard, National Grid Proposals: North East Lincolnshire, Volume 750: debated on Thursday 23 May 2024*

In the above debate - the final Adjournment debate before dissolution ahead of the 2024 General Election - the previous Government confirmed that they would urgently review the ‘pylon presumption’, in light of new facts from ESO showing the comparable cost competitiveness of U-DC.

Minister Justin Tomlinson: *“The ESO’s own recent figures for the East Anglia study suggested that, when considering lifetime cost - not just the up-front cost but the potential for long-term lower constraint cost - and challenges around delivery speed, each variable raised important questions. We cannot answer with certainty whether those questions are valid, because the data simply does not exist ... At that meeting, we were mindful to explore how we could carry out an urgent review to consider those variables and challenge those long-standing presumptions.”*

I strongly believe in the case for reviewing the pylon presumption, upon which this planning application is based, not least because it’s based on outdated cost figures but because ESO have proven that alternative transmission options can be delivered within similar timescales and are cost comparable.

Fourthly, and one of my top reasons for objecting to these proposals is the **impact on local communities**.

Throughout multiple rounds of ‘consultation’, all I have ever asked of National Grid is for my constituents in South Suffolk to be treated fairly. We are bill payers too and are in part funding the significant infrastructure being pursued in Scotland and the north of England, to the benefit of their residents. Crucially, by National Grid’s own admission, this infrastructure is primarily going offshore to “significantly reduce its impact on communities”.

From: SEGL1 <info@seg1.nationalgrid.com>
Sent: 26 May 2022 3:39 PM
To: [REDACTED] <[REDACTED]>
Subject: Re: [EXTERNAL] SEGL1.

Hi [REDACTED]

This is a good question.

Routing the cable overground for hundreds of miles would likely require overhead lines that would cause disruption and visual impacts to many communities, ranging from County Durham to southern Scotland, where the route originates. By routing the cable under the North Sea, away from settlements, we significantly reduce its impact on communities.

I hope that the above is helpful but do let me know if you have any further questions.

Thanks,
The SEGL1 Community Relations Team

The above email is from National Grid’s community engagement team on the northern project, in response to the following question from a member of the public: *“Would you know the reasons to go submarine rather than overground, there are many obvious advantages but would be interested to understand the primary considerations?”*

It is blatantly clear that, off Scotland and northern England, the primary consideration is the protection of communities. All we want is to be afforded the same protections in East Anglia.

I have been contacted by hundreds of constituents in South Suffolk who will be negatively impacted if this planning application were to be granted. From their enjoyment of the countryside to house prices, pylons would cause not just lasting visual harm, but also financial harm.

In comparison, the undergrounded HVDC route is good for the Dedham Vale, and South Suffolk; it is affordable; and I believe it would be far less damaging to our countryside in the long term, supporting our rural way of life – including our crucial tourism and agricultural businesses. With a delivery date of 2034, this option could be cheaper for bill payers, and could be used as a trailblazer approach for U-DC elsewhere in the UK.

As a region, we deserve the same recognition of the need to balance this new energy against mitigation of infrastructure impact, and with an option on the table that could be cheaper and less controversial to communities.

To conclude, I am not against new electricity transmission infrastructure, but I must object to these proposals for Norwich to Tilbury because, as I have set out in detail above, there are perfectly feasible alternatives to pylons that are cost comparable; are more popular with local people; and crucially, would protect the countryside from permanent visual despoilment.

Thank you for your consideration.

James Cartlidge MP

Member of Parliament for South Suffolk