

To: contact@n-t.nationalgrid.com

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Tilbury 3

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Contact: Louise Staples

## National Farmers' Union Comments: National Grid – Great Grid Upgrade: Norwich to Tilbury Statutory Consultation – July 2024

The NFU represents 45,000 members across England and Wales. In addition, we have 20,000 NFU Countryside members with an interest in farming and rural life. The NFU would like to make the following points in regard to the Great Grid Upgrade: Norwich to Tilbury project for consideration for the further development of the project.

### 1. Pylon Locations

As mentioned in our previous consultation responses, there have been concerns raised by our members regarding the location of pylons. In particular, at a recent member meeting, several NFU members repeatedly raised concerns that National Grid Electricity Transmission (NGET) are not sufficiently engaging on the placement of pylons.

Some anecdotal evidence provided by our members includes:

- Lack of flexibility on a member's proposal to move pylons 200m, which would greatly help the member maintain their agricultural operations.
- Apparent confusion over the Holford rules when a member requested the movement of a pylon (no. 44) from the top of a hill.
- Pylons being moved onto productive agricultural land in order to benefit a nearby equestrian facility.
- A member's farm being cut in two by the construction corridor and haulage roads significantly cutting cropping area. Their proposal to resolve this being rejected without proper consideration or explanation
- The placement of a pylon in front of a cottage which is let out, which could mean the member may lose their tenant, negatively impacting their business.

The NFU would like to reiterate that NGET must swiftly and comprehensively consult with farmers and growers on pylon locations, to minimise any adverse effects on agricultural activities and land/property values. Food production and farming must be prioritised over non-essential food businesses.

The NFU understands that pylon placement can be controversial if a pylon is moved from one landowner's land to another landowner's. Therefore, it is essential that NG weigh up the evidence in a fair and justified manner, and provide transparency and justification to their decision making process.

### 2. Underground Cables

The NFU has mentioned in previous consultation responses its view on underground cables; that the NFU would like to see greater consideration of underground options outside of AONB's, especially where the location of pylons would provide significant disruption to farm businesses on a permanent basis, and would impact locally attractive landscapes outside of the AONB. We note that there will now

be approximately 25km of 400kv underground cabling, with the option of a further 2 km if the Waveney Valley Alternative is considered.

We see that the following has been stated in FAQs regarding undergrounding:

*We need to consider national policy statement EN-5 which covers the development of new energy infrastructure. This policy concludes that in most cases, the government expects that overhead lines will be appropriate and should be used as standard to reinforce the grid. Our assessments have shown that undergrounding, including using HVDC cables, would be significantly more expensive and would have environmental impacts and would present engineering challenges. Due to the higher price that would be involved in an underground alternative, we do not believe that this would be the most suitable option as all costs ultimately go onto domestic energy bills.*

The NFU understands that the statement above refers to undergrounding cables in a traditional trench method and would like to know whether NGET have carried out an assessment to underground the cables using a Cable Plough method. It is understood that power cables of 400kV can be ploughed in and that there is far less disturbance to agricultural soils.

The NFU seeks confirmation as to the width of the construction corridor for cable placement; using trenching techniques, is this to be 120m?

It is stated in the PEIR that NGET will lay underground cables at a depth of 0.9m from the top of the protective tile to the surface of the soil. The NFU consider it imperative that where cables are laid on agricultural land, they are laid at a minimum depth of 1.2m to the top of the tile, to ensure there is sufficient distance between the cables and farming operations to minimise any potential risk.

### 3. National Grid ESO Study March 2024

The NFU notes that the [National Grid ESO study](#) states that Option 8, the Onshore HVDC Option (underground), would be the most cost-effective solution if the project is delayed to a 2034 delivery date. This Option 8 is also more positively ranked than Option 3 (closest to the status quo) when appraising community sentiment.

While NGET has published [a response](#) to the ESO study, the NFU believe it would be helpful for NGET to provide greater clarity on their decision making process, and how they weigh community sentiment vs the various other factors.

From previous discussions with landowners, we understand that underground options (such as Option 8) are the preferred option. While there is a greater impact on the land and agricultural operations in the short term, once land is reinstated the impact on landscape and agricultural options is much less. The NFU would like to understand how National Grid have considered the longer-term impacts on agricultural businesses, given the context of the National Grid ESO study and community preference for an underground option.

### 4. Communication and Coordination with Landowners

The NFU has previously stated that NGET should carry out far more one to one consultations with landowners and occupiers affected by the preferred route alignment and pylon locations. The NFU has received feedback from some affected members that communication and coordination from NGET has not met their expectations. Given the significant impact to livelihoods from this project, the NFU would expect NGET and their agents Fisher German (FG) to be providing much better communication with affected landowners.

Some specific examples where NFU members have suggested NGET/FG could improve:

- Providing better and more clear explanations of why pylon positions can/cannot be moved
- Highlight clearly how and where landowners can find out how NGET have addressed their previous consultation responses
- Better access to clear data as to why the project cannot be undergrounded or offshored.

In regard to the contractors carrying out surveys, there has been a lack of communication between FG and the contractors doing the surveys. Members have provided information to FG which does not seem to be being passed on to the contractors where there are issues over land being accessed, especially with horses. It has also been mentioned that contractors are not turning up on agreed dates, and far more contractors and vehicles are turning up than expected. The NFU would expect to see better communications from contractors doing surveys, communicating when they will arrive and the numbers of staff and vehicles expected.

## 5. Cumulative impacts

The NFU would like to understand further how National Grid intend to reduce the cumulative impact of this project with other significant infrastructure within the project area on agricultural land. We are pleased to see that NGET has identified other projects where there is likely to be a cumulative impact; especially significant projects like the Bramford to Twinstead project, the Anglian Water SPA pipeline from Bury St Edmunds to Colchester, Sheringham and Dudgeon Extension Project, Five Estuaries Offshore Wind Farm and the North Falls Offshore Wind Farm.

NFU members are seeing an increased number of projects impacting their businesses in the East of England, which is taking a significant toll on their livelihoods and mental wellbeing. Specific issues such as temporary and permanent loss of land, multiple non-intrusive and intrusive surveys from different groups, and the day-to-day impact of multiple contractors can cause significant disruption for affected landowners. It is also very time consuming, and NGET along with other developers do need to get better at fairly compensating for landowners' time.

Cumulative impacts are highlighted in the PEIR and briefly mentioned in the Project Background Document, stating that NGET plans to *"Wherever possible ... work collaboratively with other developers to consider their proposals and adjust our plans accordingly."* The NFU would like to know in greater detail how NGET are working with the operators of other projects in regard to their planning of this project, to be able to minimise day to day disruption to affected landowners. This has not really been clearly stated.

## 6. Access and haulage roads.

The NFU believes it is important for NGET to consult and agree with landowners any temporary and permanent access routes to the construction corridor, as well as compound sites where possible. We would like to see these highlighted on individual landowner plans for greater clarity. These routes should ideally avoid access through any active working areas such as farmyards, grain stores or any on-farm facilities.

Where any land is being severed by temporary construction, it is important that farmers are provided with sufficient temporary access over the construction site or haul roads, so agricultural activities can remain.

The NFU would like to discuss with NGET in greater detail how the haul roads will be constructed. While some details have been highlighted in the PEIR, Ch 4 Project Description, further information would be welcomed.

## 7. Environmental Mitigation and Biodiversity Net Gain (BNG)

The NFU have raised in previous consultations the role of Environmental Mitigation and BNG in this project. However, we would like to reiterate that the NFU would like to see a full consultation with landowners over the location of land proposed for any environmental mitigation or BNG, to ensure it is located in areas that are less productive or that have the least impact on agricultural operations.

We note that the NGET have highlighted potential areas for BNG and environmental mitigation in the PEIR, under "Environmental Areas". The NFU would expect to see that NGET has already contacted and is in full discussions with any landowners whose property falls within these areas.

It is stated in PEIR, Ch 8 Ecology and Biodiversity, that "*following the input of post-intervention habitat information (following habitat replacement, enhancement and creation), the Project is currently achieving -6% BNG for area habitats within the draft Order Limits. In order to achieve the commitment of 10% BNG, National Grid will follow the mitigation hierarchy, first looking to avoid effects, then to mitigate within the draft Order Limits, before looking at off-site compensation solutions.*"

To achieve this, the NFU would like to know to what extent NGET has now engaged with the opportunity for offsite Biodiversity Units or Environmental Areas. This was mentioned in the 2<sup>nd</sup> consultation as an opportunity to provide greater flexibility for farmers and landowners to engage with the process while taking pressure of those who are directly impacted.

## 8. Construction: Soils and Drainage

The NFU would like to understand how NGET plan to reduce the impact of construction on ongoing farm businesses, with specific reference to soils, irrigation and drainage. Given the proclivity of haul roads and compounds that are outlined in the PEIR, the NFU would like reassurance that NGET have fully considered the issues of soil disturbance, soil compaction, and the risk of contamination from building materials in these areas.

The NFU understands from previous consultations that soil management measures will be detailed in a Soil Resource Plan (SRP) as part of the Code of Construction Practice (CoCP), and that appropriate soil conditions will be recreated when land is returned to agricultural use.

Similarly, these construction activities will have the potential to have a negative impact on field drainage. While this is partially mentioned in the PEIR, the NFU would like to know whether NGET have plans to engage with a local drainage contractor/consultant to ensure that any disruptions from construction can be quickly and efficiently dealt with, minimising the impact on agricultural businesses.

The NFU would like to know how NGET is going to reduce the impact on irrigation to crops and what consultation has been carried out with landowners specifically on irrigation of crops.