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Our ref: PEA3/2

Your ref: EN020027

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23 January 2026

Dear Sirs


**National Grid's DCO application re Norwich to Tilbury transmission line  
Development Consent Order (DCO) registration process**

1. Thank you for the Rule 6 letter which we have been forwarded by our clients Pylons East Anglia Ltd. We (by that we mean them and/or with us and/or counsel representing) take a keen interest in the matter and will be registering to appear at least at the 10.2.26 PH and the ISH on 13.2.26.
2. It would help greatly in preparation if you would, please, clarify what the ExA has in mind to be considered at the ISH on 13.2.26 and how it intends to approach this. On one reading of your letter, this is the only intended opportunity for the ExA to consider alternatives and one at which our clients would have no opportunity to input into. We seek your urgent clarification as to whether this is indeed the case, which would be a matter of profound concern if so.
3. As you should be aware, this issue (alternatives) is a matter of acute concern to our clients and indeed others, including the local authorities involved. There is the issue as to whether this was done properly in the consultation process, which is legal background we may bring to the ExA's attention again, but substantively, based on the application as made, does need to be explored by the ExA in depth.
4. Put shortly, it is impossible to be satisfied that NG has chosen the most appropriate method for proceeding with what all accept is a necessary requirement to transmit electricity from the East Anglia region to the London region. NG might justified or at least clarified this had the consultation process proceeded as it should have, but it did not. Instead, it has proceeded with what we (and many others) perceive to be a fundamentally flawed premise, namely that the proposed pylons are the most effective way of securing the accepted objective in terms of cost, environmental considerations, and speed of delivery. The application as made would have very substantial environmental impact, take a long time, and be very costly. The ExA should not recommend it unless it is satisfied that it is indeed the optimum way forward.
5. So if justice is to be done to this issue, there is much detailed material to cover. The ExA will need to understand fully issues relating to the use of existing infrastructure, including capacity constraints, opportunities for upgrading it and, for example, making use of the existing but soon-to-be-dismantled sub-station at Bradwell-on-Sea and route onwards to Tilbury. Related to that, and that route, a recurring issue and one which we believe could save a vast amount of difficulty with this project is undergrounding (and possibly sub-sea to that point) using

HVDC. NG has conspicuously failed to provide properly articulated information about the scope and cost for undergrounding.

6. Further related is that this method would save unnecessary damage (due to a much narrower cable path required) in the Dedham Vale National Landscape and thus be consistent with CROW Act duties. Close to that area, we are aware how such an approach would likely avoid difficulties at Ardleigh. Similarly, the ExA cannot be satisfied on current information that offshore alternatives (possible combined with on-shore as mentioned from Bradwell) have been properly explored.
7. As for capacity, the ExA will need to probe – and objectors given the opportunity properly to consider – NG’s responses to, which should all have been part of the consultation – other related issues such as how capacity constraints could be improved (for example by use of TS Conductor, LineVision\_Dynamic Line Rating (DLR) sensors (used elsewhere in the UK, but not in East Anglia), dynamic line ratings, advanced power flow controls, transmission switching, and EC5 Constraint Management Intertrip Service (CMIS). These are essential in the light of requirements of policy EN-5 (2.10.5 and related statements concerning alternatives).
8. We believe that NG has indicted that there is a problem with supply of HVDC cables which could lead to delayed delivery. But this and related supply issues require serious probing, given NG’s position in the marketplace.
9. There are other broad issues which may impact on the issues of alternatives: biology, ecology, nature conservation, landscape, health and well-being, landscape, land-use and agriculture, safety and security, socio-economic, transport and traffic impacts.
10. And closely related to the above points we highlight again that NG has failed to follow Treasury Green Book Guidance in the formulation of this project. The ExA must pay close attention to this.
11. So: for the purposes of this letter, we do wish to point out that there is a huge amount of material potentially to cover at the ISH fixed for 13.2.26 and in the interest of fairness raise these points in outline now so that the ExA can be sure it will make adequate time, then and/or at some future date, for their consideration.
12. We also seek guidance please on how the ExA would consider itself best assisted by us (and many others with similar concerns) in dealing with this. Does it want written material in advance of the ISH, for example? And what oral input will it permit at the ISH? If the answer is none, will the ExA commit to holding a further ISH on alternatives later in the examination at which our clients can make submissions, give evidence, and ask questions?
13. We also note a reference in your Rule 6 letter to a transcript – that is on page A1 (p.7 of the .pdf) – does that just relate to that hearing, or are all the hearings going to be videoed and an official transcript made? We would expect the latter given the matter, but please confirm.
14. Please can we have your urgent response so we can prepare efficiently for the upcoming hearings.

Yours faithfully



**RICHARD BUXTON SOLICITORS**

cc. ENSP attn: 