

26 January 2026

Dear Susan Hunt, Christopher Butler, Jon Hockley, Matthew Sims and Ken Stone,

Letter from Pylons East Anglia Ltd (Interested Party [REDACTED]) in response to the Rule 6 letter (EN020027 13 January).

1. We are delighted to see such a thorough outline agenda for the Examination of the Norwich to Tilbury DCO, and we are grateful to the Inspectors for their time spent to understand the issues.

2. About Pylons East Anglia Ltd.

- 2.1. We would like to remind you that Pylons East Anglia Ltd (which campaigns as the **Essex Suffolk Norfolk Pylons** action group) represents communities/residents the length of the Norwich to Tilbury DCO route. Our committee has members from all three counties.
- 2.2. Our petition for better alternatives has been signed by 40,000 people. Our Facebook group has 7,000 members and we regularly email 2,000 supporters. We have held numerous informational events since the first, non-statutory consultation, along the route.
- 2.3. Our fundraising has enabled us to appoint a team of expert consultants and a legal team, and we have submitted very detailed and lengthy evidence to National Grid at every stage of consultation.
- 2.4. We therefore consider it essential that we are able to participate in Issue Specific hearings to make our case for our supporters and the communities of East Anglia.

3. Request to participate in Issue Specific Hearing 1, 13th February.

- 3.1. The first of the Issue Specific hearings relates to Alternatives, on 13th February. We note that participants will be invited by the Inspectorate. We would like to request attendance to speak at this hearing.
- 3.2. Our case presented for our supporters since the first consultation has been based around the lack of consideration of appropriate alternatives, and we have done a great deal of research into those alternatives, as well as submitting detailed evidence to National Grid, NESO, DESNZ and Ofgem.
- 3.3. We feel that it would be very beneficial for the Inspectors to be able to question, and hear from, our team directly on this very key and complex component of the Examination.

4. Request to participate in the Preliminary Meeting to discuss Agenda Item 3 -

Initial assessment of principal issues. There are areas in the Principal Issues where we feel additional focus would be helpful, and that we would like to raise. We outline these below (in the order in which the Rule 6 letter addresses them in Annex C):

4.1. Air quality and emissions

4.1.1. We would like to see the **carbon emissions** of the proposal versus alternatives examined.

4.1.2. Dust

4.1.2.1. We believe that it is essential to examine the airborne risks to human health associated with drying of acidified sediments that may release dust containing harmful particles (see 4.3.5 to 4.3.7 below).

4.2. **Alternatives.** We are pleased to see broad consideration of the alternatives to overhead lines by the Inspectors and would like the Applicant to explain the below:

4.2.1. **Use of existing transmission infrastructure.** We seek to understand (as we been unable to establish this to date) the exact extent to which the existing grid's capacity has been increased through technological means already. For example:

4.2.1.1. What is the precise capacity of the grid in East Anglia today?

4.2.1.2. What is the precise grid capacity sought?

4.2.1.3. Where are there further opportunities to upgrade existing infrastructure that could have a bearing on the need case for this project?

4.2.1.4. To what extent could technological increases to the grid be achieved, and have been considered, by the Applicant?

4.2.1.5. For example: 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, EC5 Constraint Management Intertrip Service (CMIS).

4.2.2. We dispute the Applicant's assertion that it is not possible to make use of the disused substation site at Bradwell-on-Sea and the route of the soon-to-be dismantled 132kv transmission lines for an HVDC underground cable onwards to Tilbury and this needs to be probed. There seems to be no technical reason why an HVDC cable could not make landfall at Bradwell-on-Sea and continue onwards to a converter station near Tilbury.

4.2.3. To minimise harm to the environment and communities, it is key to use existing infrastructure before building new and the NPS's give support for the use of existing infrastructure. Withdrawn and New EN-5 say:

4.2.4. “consideration of network reinforcement options (where alternatives exist) which may allow improvements and/or extensions to an existing line rather than the building of an entirely new line” (2.10.5)

4.2.5. **Coordination of infrastructure.**

4.2.6. The NESO Offshore Report 2020 summarised the benefits of coordination versus the piecemeal approach in this diagram:

Conclusions

The KPIs of the Integrated and Counterfactual alternatives are shown in Figure 0-1.

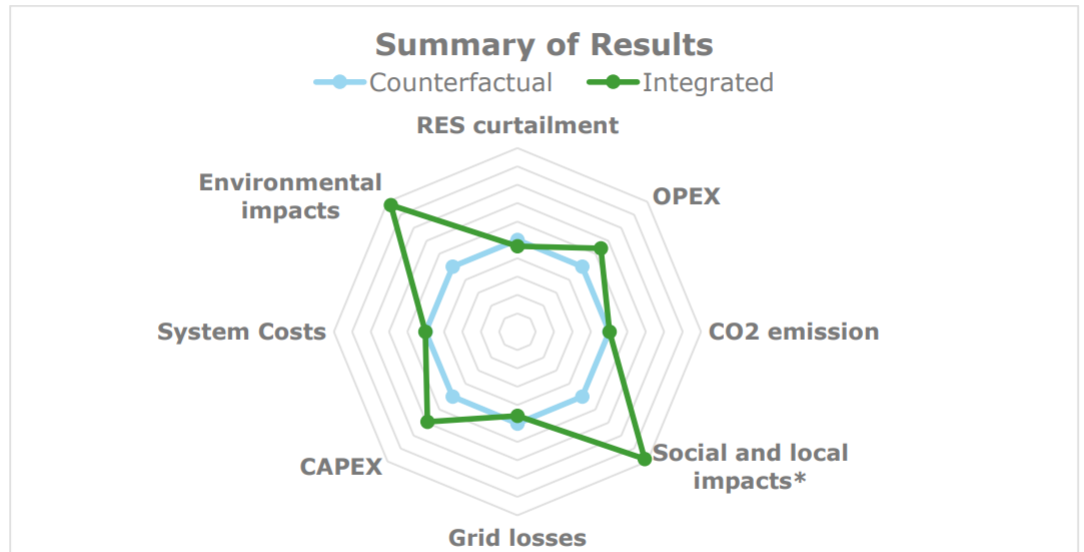


Figure 0-1 Summary of valuation results for quantitative KPIs (by how much in % the Integrated scores better than the Counterfactual) ¹

4.2.7.

4.2.8. Withdrawn and New NPS EN-1 set out the benefits of coordination, “For regions with multiple windfarms or offshore transmission projects it is expected that a more coordinated approach will be delivered. For these areas, this approach has the potential to reduce the network infrastructure costs as well as the cumulative environmental impacts and impacts on coastal communities by installing a smaller number of larger connections, each taking power from multiple windfarms instead of individual point to-point connections for each windfarm.”(3.3.71)

4.2.9. Withdrawn and New NPS EN-5 highlight the benefits of coordination which have also been set out in several reports¹, paragraph 2.7.1: “Co-ordinated applications typically bring economic efficiencies and reduced environmental impact.”

¹ An [academic study](#) in 2022 found that an integrated offshore grid in the North Sea reduces the system costs by up to £8.7bn. Details of the £2bn saving were set out in NESO’s 2020 report into the benefits of offshore coordination (links on NESO website all broken). A report for [Crown Estate](#) in 2021 concluded that, “a coordinated approach to grid connections is more sustainable and will maximise the offshore wind capacity connected to the transmission system via less infrastructure”. Further evidence on integration savings is set

4.2.10. We note that the Withdrawn and New NPS EN-5 give support for alternatives including coordination of infrastructure offshore:

4.2.11. “2.15.1 Coordinated approaches to delivering offshore and onshore transmission to minimise overall environmental, community, and other impacts, as set out above, must be considered⁴¹. The Secretary of State must be satisfied that Applicants have explained the steps they have taken to do this, the options that have been considered and the approach they have taken to coordination as set out in above at section 2.13.”

4.2.12. And “...This evidence is expected to draw substantially on the work under the **Offshore Transmission Network Review** and relevant strategic network design exercises, together with any additional supporting evidence Applicants consider relevant. The Secretary of State should also be satisfied that options for coordination have been considered and evaluated appropriately.”

4.2.13. The Offshore Network Transmission Review included the NESO East Anglia Network Study 2024. This report is therefore a material consideration. It sets out the feasibility of an **HVDC underground transmission line between Norwich and Tilbury**, which residents support.

4.2.14. We wish to see the Applicant probed about the availability of HVDC cables. NESO was told by the Applicant that a shortage of HVDC cables would lead to a delayed delivery of an HVDC option (until 2034). However, National Grid’s national business plan submitted to Ofgem in 2024 for the RIIO-T3 funding determination set out that:

4.2.14.1. National Grid has access to one-third of the world’s HVDC cables (and more than required for specific projects).

4.2.14.2. National Grid is working with suppliers who are increasing their capacity.

4.2.15. There are supply chain and engineer issues across the transmission industry – it is not clear that Direct Current cabling is worse affected than other technologies.

4.2.16. We would be keen to understand whether, given the Government’s desire to see grid infrastructure, particularly Norwich to Tilbury, built-out quickly, the Applicant considered that HVDC underground could in fact be delivered more quickly than overhead lines because the Planning Act 2008 does not require a DCO for underground cables?

out [here](#), in **2015** Integrated Offshore Transmission Project East. Prior to that, it the Crown Estate and National Grid wrote the **2011** Offshore Future Network Transmission System review. It was [reported](#) that, “National Grid has shown an offshore network would be more cost effective, reduce the number of cable landing sites and minimise onshore reinforcement requirements”. (This study has disappeared from all previously published links on the Crown Estate, National Grid and other pages)

4.2.17. As per our many representations to National Grid, including a legal opinion, we seek to understand why the Applicant has not followed **the Treasury Green Book guidance** for consideration of alternatives.

4.3. Biodiversity, ecology and nature conservation

4.3.1. An omission of the broad Examination agenda is a specific focus on bird collisions with overhead lines.

4.3.2. Withdrawn and New NPS EN-5 state, *"2.9.3. Electricity networks infrastructure pose a particular potential risk to birdlife including large birds, such as swans and geese, and perching birds. These may collide with overhead lines and risk being electrocuted. Large birds may also be electrocuted when landing or taking off by completing an electric circuit between live and ground wires. Even perching birds can be killed as soon as their wings touch energised parts of the infrastructure."* (and following paragraphs).

4.3.3. As set out in our initial submissions at registration, we do not believe that the Applicant has taken into account the risk to farmland birds or wetland birds which are known to inhabit, visit or cross the route of the pylons. This needs in-depth probing.

4.3.4. Risk to environment and human health.

4.3.4.1. The risk of **acidic sulphate soils** to the environment and human health must be considered at some stage of the Examination.

4.3.4.2. We set out this risk in our initial submission (Soils, by David Dent):

4.3.4.3. *"In addition, these soils pose **a risk to human health** via the following mechanisms:*

4.3.4.4. ***Contaminated drinking water:*** Acidic water can corrode infrastructure and leach toxic metals into supplies, posing risks if untreated;

4.3.4.5. ***Recreational exposure:*** Contact with acidified or metal-rich water during swimming or fishing may cause skin irritation or other health effects.

4.3.4.6. ***Airborne risks:*** In rare cases, drying of acidified sediments may release dust containing harmful particles."

4.3.4.7. With relation to the above risk to human health from acidic soils, we note that Withdrawn and New NPS EN-1 state, of CNP infrastructure:

4.3.4.8. *"4.1.7. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. **This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health**"*

4.3.5. We wish to see an exploration of the following:

- 4.3.5.1. how the Applicant has followed the **Mitigation Hierarchy**, as required by Withdrawn and New NPS EN-1, paragraph 4.1.5 and paragraph 2.14.2 of Withdrawn and New NPS EN-5.
- 4.3.5.2. Ecosystem services - Requires thorough examination/probing because it is mentioned frequently in NG documentation but there is no analysis or evidence to back it up. Services are not named. There's no quantification of harms.
- 4.3.5.3. Habitat fragmentation. Requires thorough examination/probing because it is mentioned frequently in NG documentation but there is no analysis to quantify the impact of the project.

4.4. **Cumulative Impact.** Particular consideration must be given to Ardleigh and Bramford, both of which are at the receiving end of significant numbers of NSIPs:

4.4.1. Cumulative impacts include best and most versatile land take, traffic, heritage, habitat and wildlife impact and **national security/defence**.

4.4.2. The security implications of concentrating so much nationally significant infrastructure in one place must be probed. Paragraph 4.1.7 of withdrawn/new EN-1 goes onto say, "and public safety, defence"

4.4.3. At Bramford Substation up to 30% of the nation's electricity set to pass through this single site, it is being surrounded by large-scale renewable and battery storage developments without any joined-up security oversight or risk assessment.

4.4.4. Little Bromley, Essex - Little Bromley Parish Council has also highlighted the cumulative risk from the potential colocation of the National Grid EACN, the North Falls and Five Estuaries windfarm substations, the Tarchon Interconnector substation and a BESS

4.4.5. While we are aware that your role is not to challenge the NPS's, it is not correct that, as stated in EN-5, *"Through this work [the HND] steps have already been taken to reduce avoidable cumulative impacts."*

4.4.6. We note that New and Withdrawn NPS EN-1 state, in paragraph 4.1.5, that the Secretary of State must take into account cumulative adverse impacts.

4.5. **Good design**

4.5.1. In particular, we would like to see the extent to which acid sulphate soils have been avoided, the extent to which a proximity to villages could have been avoided, and the extent to which sites of archaeological or heritage importance could have been avoided examined. The design of the route requiring a complex detour to a substation at Ardleigh will require specific investigation, due to the extra costs and substantial extra harm caused by this deviation.

4.5.2. As above, we wish to understand how the Applicant has followed the Mitigation Hierarchy, as per paragraph 2.14.2 of Withdrawn and New NPS EN-5: “i.e. avoidance, reduction and mitigation of adverse impacts through good design”

4.6. Historic Environment

4.6.1. We particularly urge in-depth questioning of the Applicant about the adequacy of assessment of the heritage impacts as well as the archaeological assessment as we have significant concerns about the process which we can set out in detail at a later stage of the Examination.

4.6.2. It would appear that perhaps the Applicant has not forwarded to you the paper submitted by our group to the Statutory Consultation written by heritage expert Virginia Brewer, now head of Heritage at Bidwells. We attach it with this letter to assist with your examination of the Norwich to Tilbury pylons.

4.6.3. It should be noted that Withdrawn and New NPS EN-1 state, (4.2.17):” This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests”...“where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional”.

4.6.4. Given the exceptional harm to the historic environment posed by a 112-mile pylon proposal through the heart of heritage-rich East Anglia, with around 2,000 assets affected, the Applicant’s approach to the Historic Environment requires particularly robust testing.

4.7. Health and well-being

4.7.1. We refer you to our Soils submission and our references at 4.3.5 to 4.3.7 above about the risks to human health of acidic sulphate soils.

4.7.2. Mental health of residents impacted by the project should be given due consideration in the Examination process.

4.8. Landscapes.

4.8.1. We would like to see specific focus on the landscape viewpoints considered of importance to residents, and submitted to National Grid by Pylons East Anglia.

4.8.2. We would like to add the failure by the Applicant to provide visualisations when requested after a route change.

4.9. Land use and Agriculture.

4.9.1. The Applicant should be examined on how:

4.9.1.1. they attempted to avoid Grade 1 land as well as Grades 2 and 3a/b, and

4.9.1.2. how alternatives such as upgrading the existing grid, coordinating infrastructure or HVDC undergrounding would compare from a land loss/food security perspective.

4.9.2. Note that Current NPPF says, *“187b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”* and footnote 65 states, *“Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.”*

4.9.3. New NPPF (under consultation) says, *“N1c) This should include limiting the scale and extent of development within protected landscapes, avoiding the use of higher quality agricultural land where land of poorer quality is available”* and *“N2b). Use areas of poorer quality agricultural land in preference to that of higher quality”*

4.9.4. We request that in addition to considering “inappropriate development in the Green Belt” consideration is also given to Local Green Spaces and local character areas such as the Colne Valley, Essex.

4.9.5. The NESO Offshore Report 2020 set out the reduce land take through coordination of infrastructure and the Applicant should be asked to explain why it is acceptable for the radial model to be perpetuated and to take up so much best arable land:

Table 2-3 Value of KPIs for Counterfactual, Integrated and difference (white – negligible difference, amber – Counterfactual scores better, green – Integrated scores better)

KPI	Counterfactual (C)	Integrated (I)	Difference (C-I)	
			Absolute	%
System Costs MGBP	64,581	64,503	78	0.1%
RES curtailment TWh	1,616	1,672	-56	-3.5%
CO ₂ intensity Mtonnes	208.3	208.1	0.2	0.1%
Grid losses TWh	249	259	-10	-4.2%
CAPEX MGBP	29,000	23,399	5,601	19%
OPEX MGBP	7,113	6,097	1,016	14%
(CAPEX + OPEX) MGBP	36,113	29,496	6,617	18%
Environmental impacts	Onshore area = 386 ha 100% landing points	Onshore area = 173 ha 30% landing points	213 ha	50%
	100% offshore cables 100% onshore cables/lines	65% offshore cables 40% onshore cables/lines	Integrated has about 50% of impact expected for Counterfactual	
Social and local impacts	100% lines/cables 100% substations	40% lines/cables 40% substations	Integrated has less than 50 % impact expected for Counterfactual	60%
Security of supply – Adequacy	NA	NA	Integrated scores better	N/A
Security of supply – Security	NA	NA	Integrated scores better	N/A
Security of supply – Resilience	NA	NA	Integrated scores better	N/A

4.9.6.

4.10. **Safety & Security**

4.11. We refer to our concerns about **national security/defence** above in the section relating to Cumulative Impacts, and we would like to see these issues examined.

4.12. **Socio-economic**

4.12.1. Without using the tools in the Treasury Green Book, the Applicant has not adequately analysed the socio-economic impact of the proposed overhead lines. Any analysis provided is purely subjective and should be assessed using Green Book tools, including those that are quantitative. We remind the Inspectors of our own Green Book analysis (submitted), which we prepared in the absence of National Grid's work. There has been no analysis of the socio-economic impact of alternatives.

4.13. **Transport & Traffic**

4.13.1. In addition to the topics set out, we seek to understand the traffic impacts of different alternatives to the proposed overhead lines, including upgrading the existing grid, coordination of infrastructure, and HVDC undergrounding.

4.13.2. We believe that it would be beneficial to include the cumulative impact of concurrent developments.

4.14. Water Environment

4.14.1. We refer again to the need to examine the impact of acid sulphate soils on the water environment, and on WFD status.

4.14.2. We have particular concerns about flooding and the methodology employed by the Applicant, as set out in our registration submission.

4.14.3. This is particularly important given Withdrawn and New NPS EN-1 state in paragraph 4.1.7 that the presumption in favour of CNP is disapplied with unacceptable flood risk:

4.14.4. *“Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.”*

5. Agenda Item 4 - Draft examination timetable.

5.1. We would like to request that the issues raised above are examined in Issue Specific Hearings. (This request also falls into *Agenda Item 7* - Any remaining questions or submissions regarding procedural matters not set out in the agenda that have been submitted in writing by Procedural Deadline A).

5.2. We also seek clarification of whether we are to present our case at ISH's or at the Open Floor Hearings.

6. Compliance with Procedural Decision on AI Use

6.1. In accordance with the Examining Authority's procedural decisions (Annex F), we declare that some of our submissions have, and will be, prepared with the assistance of Artificial Intelligence tools, including Copilot, Google Gemini, and ChatGPT. These tools were utilised to cross-check facts, assist with summaries (to reduce reading for the Inspectors) and to ask questions about NSIP procedural matters.

6.2. We use an AI chat interface which interrogates documentation associated with the Norwich to Tilbury DCO, and assists with searches for information. No external datasets or unverified sources were introduced by the AI in the generation of the text accessed by this chat interface text.

6.3. All AI-generated output has been subject to full human review and verification to ensure it is fit for purpose, accurate, non-misleading, and strictly aligned with the source documentation. It is used to assist and support, not to create.

- 6.4. In addition, during the registration period, we provided a tool from Zapier which assisted supporters with the creation of their submission, which we felt was essential given the complexity of the DCO/NSIP process. The tool required users to input their key areas of concern, and a draft text was created based upon those concerns for the user to build upon.
- 7.** We look forward to presenting our thoughts at the Preliminary Meeting and very much hope that you will consider that Pylons East Anglia Ltd adds value to the first Issue Specific Hearing.

Yours sincerely.

Rosie Pearson

Founder, Essex Suffolk Norfolk Pylons action group (Pylons East Anglia Ltd)