

Response to the Planning Inspectorate regarding National Grid N2T  
Harry Lushington, 10 November 2025.

I object to the plans by National Grid Electricity Transmission (NGET) for the N2T overhead transmission proposal. The reasons are cost and economic impact, where NGET is picking the cheapest solution for it at the expense to the country and bill-payers. I am not directly impacted by the route, as it is out of my sightline, but the works do significantly impact on my neighbouring village of Offton, where NGET plans to dissect the village in 3, along with the whole of East Anglia, which will be desecrated due to damage and costs to residents and businesses. NGET has failed to run a fair and open consultation. How can the inspectorate provide a decision when there have been no costings, no alternatives, no transparency and no oversight?

This response covers 3 areas – cost, technology and economic impact.

1. Cost. The route is only half way to the source of power in the North Sea. Each of 10 windfarms then has to put in the remaining connections. NGET reports its solution is the cheapest – but this is only the cheapest for National Grid and leaves the consumer picking up the bill.

This is an expensive solution. Recognising that each windfarm is not at the same endpoint the cost is at least 2 times the length of powerline needed, where NGET is providing only half the connection. The end consumer will carry the cost. See also details reported on Wednesday 15 October to the Energy Select Committee by industry experts covering non-commodity costs. (See \*1 for Map and further description).

2. The technology is inappropriate. All power suppliers are moving to HVDC (High Voltage DC), and moving away from HVAC (the technology used on pylons). This move to HVDC is recommended by NESO. All windfarms produce DC. AC is a leftover from when power was moved from central power stations to distribute out to the regions.

NGET reports that undergrounding is uneconomic. This is true for AC as a wide trench is needed. But not true for DC which can be placed much closer together. Underground DC also needs less maintenance over time. However NGET has failed to provide the difference in the economics between underground DC and AC pylons. Further, NESO suggests that undergrounding HVDC becomes cheaper still in the near future due to commoditisation of the technology (all countries are moving in the same direction, except possibly the UK). The current approach by NGET has been designed to exploit the rush to 2030, where a more considered solution with advances in technology will have a greater impact for all. (See \*2 NESO)

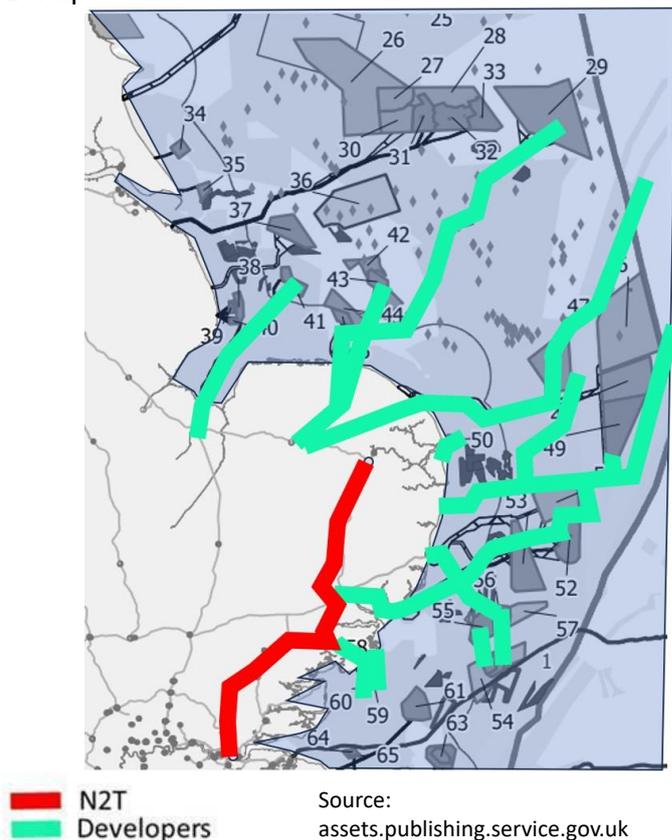
To justify National Grid's solution it has:

- a) Forced an approach that all technology used must be pre 2010. Which is ironic given the green revolution and windfarms are after that period. This luddite tactic will cause significant consumer and national harm.
- b) In order to justify not using undergrounding, NGET has stated the geological conditions are unsuitable. But Anglian Water has just put in new water mains across East Anglia on a similar path without issue – underground. The “facts” that National Grid has produced to justify its approach are simply not facts.

3. The economic damage inflicted by NGET’s solution has not been taken into account. There has been no financial review, even NGET’s own costs have not been clearly articulated, including what is and what is not covered in the scope of the N2T solution. Its proposal covers installing pylons twice the size of existing pylons, and a new private road dissecting East Anglia. No consideration has been provided for cutting communities in two, the blight caused to both businesses and residents, and the cost of disruption. For example, in our local village two small farmers will have their land bisected and will lose significant square meterage to production, effectively rendering their businesses unviable.

In summary National Grid has chosen to promote a solution that will enforce its monopoly on suppliers at the cost to the country and consumer. Its solution is not fit for purpose. There has been no validation, audit or regulatory oversight provided. Ofgem has explicitly stated it does not regulate the consultation practices of Transmission Owners (FOI request to Ofgem Ref FOI2025/01671). It is also noteworthy that the NGET consultation process did not follow government best practice, Treasury Green book or Holford rules.

\*1 Map



Source:  
[assets.publishing.service.gov.uk  
map.4coffshore.com/offshorewind/](https://assets.publishing.service.gov.uk/map.4coffshore.com/offshorewind/)  
National Grid

- The map shows only the proposed N2T route. There are numerous other NGET projects, some 4 are at Bramford. This makes it impossible to look at the holistic picture. The costs are stated by NGET to be confidential, meaning there is no scrutiny over the costs. Moreover by using a “salami” slice on each project the true costs of its approach are hidden, making it impossible to compare with alternatives.

- The logic of the new line was explained to me by NGET at one of its roadshows as:
  - The need to bring power in from offshore. At that moment NGET was working on the basis of 40gw generation from North Sea turbines split into 22gw coming onshore via Lincolnshire and the remaining 18gw via East Anglia.
  - Each pylon line has the capacity for 6gw transmission.
  - NGET has 2 lines already so needs 1 additional 6gw line to support the transmission of the 18gw total.
  - But NGET has a requirement for resiliency, meaning that it needs an N+1 set of circuits. The alternative route from Norwich is equally constrained. Therefore it is highly likely that NGET is planning to request a further set of pylons across the same route as N2T, making use of its private road. None of this has been shared, the question is whether the inspectorate will encourage this tactic.
- There is an absence of transparency through all NGET's plans. All members of parliament along the route are concerned, given the hostility to the scheme by their constituents. Further their concern is amplified by the unreasonableness of NGET to be transparent with costs and alternatives. The concern is that National Grid's approach for a modern low-carbon renewables-led generation capability is to exploit its monopoly providing the least beneficial solution to all others than itself. At the cost to the country and bill-payers.

It should be noted that all other countries with windfarms in the North Sea (Germany, Denmark, the Netherlands, Belgium) are all putting in an offshore grid to enable windfarms to connect to their grid offshore and bring the power onshore less often. The UK is the sole exception.

There are rumours, not denied by National Grid, that it has already purchased the materials for its N2T solution. This would explain its approach of failing to provide costs or alternatives, and would explain the pre-defined solution – with the wrong technology in the wrong location and no effective governance. A situation close to HS2's development.

#### \*2 NESO

The Electricity System Operator (ESO) became the National Energy System Operator (NESO) on October 1, 2024. This change involved the government acquiring ESO from National Grid and rebranding it. NESO "plans" for both gas and electricity networks in the UK. As part of National Grid it wrote a report titled ESO East Anglia Network Study, dated March 2024. This report was predominantly produced to rubbish the idea of an offshore grid by comparing point solutions to an holistic network. It included providing a business case against offshore by comparing the point costs of coming onshore, going back offshore and then coming onshore again (3 circuits) against a single circuit from Norwich to Tilbury, which unsurprisingly came out the cheaper option.

However there are a couple of slipups highlighting the flaws in its approach. Firstly page7 - "More recently, we have moved to an approach where the electricity network is designed holistically from the very first step in the cycle, considering the impact of multiple connections in a coordinated way, and balancing different network options against the four design criteria mentioned previously". This is for the simple reason of preventing duplication, minimising overall cost, and reducing environmental and community impact. It

is my request that the planning inspectorate should request the N2T proposal be reviewed with the other changes in East Anglia against the NESO framework.

Secondly option 8 – an onshore HVDC route, page43 – “Economic Rank £1bn. The options received a Green rating costing £1bn more over its lifetime compared to the cheapest option (Option 3 delivered in 2030). This option although at the higher cost, and delayed, performs well over its lifetime.”

NGET has provided no set of costings for its N2T proposal, only the assertion that it is the cheapest, though it does not state who it is cheapest for. The conclusion is that costings cover the installation of pylons and cables with associated resource costs and nothing else. There are some 154 postcodes directly affected by the N2T proposals, where impairment will affect properties through either compensation schemes or the courts. The blight or compulsory purchase costs will be a minimum of £0.4bn for residential properties. On top of this there will be substantial costs through business interruption and damage due to blight. East Anglia has a significant hospitality sector, where hotels, pubs, restaurants and campsites are likely to be damaged by National Grid’s solution. As no business case has been presented this makes reviewing the financials by NGET near impossible. It has, however, seen an influx of work for land agents and compensation lawyers.

There is a mishmash of documents, some out of date, some stating the opposite from another. Again this supports the request to the planning inspectorate that an holistic study with fair consultation (including costed options and alternatives) is provided before any decision is made.