

To: The Planning Inspectorate

Subject: Response to 4.2 Funding Statement, Final Issue B, February 2026

Planning Inspectorate Reference: EN020027

This response on behalf of Offton and Willisham PC to the National Grid (NG) Funding Statement covers:

- Timeline and Energy Security
- Underground
- Swimming Pools
- Property
- Economy
- Summary

1. Timeline and Energy Security

"The government is pursuing a goal to achieve clean power by 2030 for Great Britain, including developing a range of pathways that reflect the possible routes to a decarbonised power system" (source: Funding Statement). There are 2 existing High Voltage AC (HVAC) overhead existing lines built in the 1950s from Norwich to Tilbury. These are old height 15m pylons, compared to the proposed double height and 4 times the size pylons proposed by NG. No analysis has been provided on usage, capacity, or forecast for the current network.

No offshore wind actually connects at Norwich. N2T is one of several projects presented in a piecemeal way too hide the purpose of reinforcing an old network based now in the wrong location using the wrong technology. Experience in Ukraine shows the danger of exposed power networks. Yet NG proposes to have the N2T route use Bramford, along with a number of other NG projects, all converging on a single point of weakness. The proposed route by NG reduces our energy security, it does not increase it.

NG has suggested that without the project it would add significant costs to the consumer (Funding statement page 6 section 1.1.4, and page 10 section 3.1.5). No evidence or numbers are provided to substantiate this assertion. NG has utilised the marker of 2030 to justify reinforcing N2T, citing NESO. These muddled facts have been used to incorrectly suggest that NG has a Licence Obligation, when the obligation is to meet government goals on Net Zero, including reducing costs for consumers and increasing energy security.

NG has chosen a process of 2 non-statutory consultations and 1 statutory consultation to progress the N2T plan, but there have been no alternatives examined, no costings, no definition of scope. This has delayed planning and "kicked the can down the road" in order to create a false and narrative that N2T is required in its current form.

2. Underground

"NG plans on approximately 159 km of new overhead line supported on approximately 509 pylons, 21 km of 400 kV underground cabling" (Source: Funding Statement). NG attack dogs state undergrounding is unaffordable as it is 10x cost of overhead. But this is for HVAC, which is the old technology proposed by NG. ESO identifies undergrounding High Voltage DC (HVDC) will be at a comparable cost in the early 2030s (Source: ESO East Anglia Network Study, dated March 2024).

So a reasonable assumption is, it is currently 1.5 times the cost to underground HVAC than the proposed overhead lines. Which implies difference in undergrounding HVDC compared to HVAC is $10/1.5 = 6.7$ times cheaper. Or $6.7 \times 21\text{km}$ is 140km underground HVDC for same cost as NG proposed underground of 21km HVAC.

The total length is 180 km. It is suggested a cheaper alternative would be to underground the remaining 40km rather than spend the money on 159km of overhead HVAC lines. As NG has produced no financial breakdown it is impossible to unpick its figures, and its numbers make a mockery of any oversight in the planning process.

NG state this project is for reinforcing the network. The only conclusion, given NG figures, is the real reason is to reinforce its monopoly on 1950's HVAC network. Further, no costings appear to cover maintenance for above ground lines and physical pylons.

This approach for NG to maximise its monopoly using the wrong technology is damaging to consumers who will have to pay for these inefficient and destructive services, and damaging for residents with an impaired economic setting.

NG states that it is regulated by Ofgem (source: Funding statement page 8 section 2.1.3 and page 11 section 3.2.1). This is not true. See Ofgem freedom of information request FOI2025/01671 which states that Ofgem does NOT regulate the consultation practices of the Transmission Owners. No oversight has happened on NG's consultations, where no alternatives, transparency, scope, or costs were provided.

NG has stated in the past that East Anglia is unsuitable for undergrounding. This is again incorrect, Anglian Water has just put in a new main across East Anglia (source: Anglian Water).

3. Swimming Pools

With 509 Pylons (source: Funding Statement), and assuming 1 pad foundation size 2.6m x 2.6m x 3m deep results in 20m³ capacity of concrete. And for 4 pads per pylon 80 m³. For the 509 Pylons mentioned requires 40720 m³ of concrete. An Olympic swimming pool has a

capacity of 2500 m³, meaning National Grid plans to pour 16.3 Olympic pools of concrete just for the foundations.

With concrete CO₂ per m³ of 410 kg, this means NG plans to emit 16,695,200 kg of CO₂, or 16,695 tons. Figures are missing all transport costs, costs of excavation, and congestion. This is not environmentally sensible when there are better, cheaper and more practical alternatives.

4. Property

There are 154 postcodes directly affected on the N2T route. Using historical house prices in Rightmove.co.uk, a total of 595 properties sold in the 154 postcodes. Analysis done in 2024 identifies value of sold properties as £346m, for properties between 1990 to 2024. Therefore average property was sold in 2007. Assuming a 40% uplift to 2024 prices identifies £484m. But the database only covers sold property, so assuming it is one in two, an uplift of 2 identifies a more realistic £968m value of property directly underneath the N2T route.

With an impairment average of 20% * equates to £194m. However compulsory purchase, as mentioned by NG, will be required. It is safe to assume this will cover 20% of properties, giving 80% remaining impairment of £155m, and the cost of the compulsory purchase at £194m, total £348m.

NG states it has made an allowance of £184.9m. This does not appear to match real data. No narrative has been provided to clarify the NG numbers, or the scope of what they cover.

Further, the LSE report into pylons show an average £12.5k per property (Source: LSE and Telegraph 22/08/2024). Findings suggest that the construction of new overhead pylons reduces prices by 3.9pc for properties up to 1500 metres away, suggesting the impacts extend further than previously estimated. This catches a significantly greater number of houses than the above.

There is no clarity as to what is included/what mechanisms, and scale for compensation in the funding report.

* 20% As identified by a panel of estate agents and property consultants.

5. Economy

In the funding statement page6 there is a line: "Ancillary and/or temporary works associated with the construction of the Project". NG plans to build a new road across East Anglia - this detail is hidden (source: NG documents). There is no clarity of how long this road will be in place, or if, more likely, it becomes a permanent feature.

For Offton, NG plans to split the village into 3 as it also plans undergrounding existing services.

No where does NG recognise economic damage. This should include business impairment, such as farms cut in 2, hospitality businesses damaged by interruption and permanent damage to the locale. Anecdotal evidence in Offton identifies farms that will be no longer viable.

6. Summary

From the above it is safe to conclude that there has been:

- No clarity on numbers
- No definition as to why NG has chosen 1950's HVAC pylon technology
- Factually incorrect statements made such as regulation by Ofgem
- Illogical assertions to suggest NG has a Licence Obligation
- No validation on compensation other than an assertion that property consultants have been consulted
- No analysis of the property along the route, the scale of compensation, and level of blight expected
- No assessment of the economic damage to businesses and the community
- Key details have been hidden under the terms "Ancillary and/or temporary works"
- No clarity on the scope, plan, cost, or timeline.