

Follow-Up Submission to the Examining Authority

Norwich to Tilbury Project (EN020027)

Matt Day (Interested Party)

March 2026

I refer to my oral submission made at the Open Floor Hearing (OFH1, Session 2) on 11 February 2026, and my written submission which was necessary due to the short window provided at the session to raise all my points. This relates to the Applicant's response as set out in Document 8.5.4 *Applicant's Response to the Open Floor Hearings* (February 2026).

I have reviewed the Applicant's thematic response. The document addresses some of the broader topics raised across all three Open Floor Hearings, but a number of specific points from my submission have been either entirely omitted or dealt with only in generic terms, without engaging with what was actually raised.

This follow-up identifies those gaps. I ask that the Examining Authority notes them and that the Applicant is invited to respond directly to each of the matters set out below.

Transparency of Consultation Materials

My submission raised specific concerns about how the project was presented to the public during consultation. The Applicant's response includes lengthy sections on the consultation process, describing the number of stages, the methods used, and how feedback was considered. None of this addresses what I actually raised.

My concern was not about how many consultations took place, but about how the information was presented within them. The interactive maps used during consultation had the temporary access roads (and other key project impacts) deactivated by default. A member of the public looking at the map would see the pylon route but not the approximately 2 million square metres of stone haul road required to build it. That is the equivalent of paving over 400 football pitches of productive farmland, footpaths and hedgerows, and it was hidden behind a toggle that many people would not think to click. The line markings on the maps were also not intuitive for anyone unfamiliar with technical plans, and the digital visualisations do not reflect the true scale of the impact.

This is not a minor presentation issue. If the consultation materials are designed in a way that minimises the apparent impact of the project, then the public cannot make informed representations and the consultation is not doing what it is supposed to do. The Applicant's response does not acknowledge or address this. I ask the Applicant to explain why the temporary access roads were hidden by default on the interactive map, and whether they consider that the consultation materials gave the public a fair and accurate picture of the full scope of construction works.

Off-Book Property Acquisition Costs

In my original submission, I raised a specific and serious concern. A National Grid representative at a public consultation session confirmed that significant property acquisition costs are being attributed to a separate property portfolio budget rather than the project's own cost line. I also noted that vendors have been required to sign non-disclosure agreements (NDAs) to conceal these transactions.

This goes directly to the integrity of the cost comparison between pylons and alternatives (including offshore HVDC), which is central to the Applicant's case. If material costs are being excluded from the project budget and accounted for elsewhere, then the comparative cost figures presented to this Examination are incomplete and potentially misleading.

The Applicant's response makes no reference to this allegation. There is no acknowledgement, denial, or explanation. Given the significance of this to the value-for-money assessment, I ask that the Examining Authority requires the Applicant to respond directly on the following:

(a) Whether property acquisition costs associated with the Norwich to Tilbury project are being recorded in full against the project budget, or whether any such costs are allocated to a separate corporate budget or portfolio.

(b) Whether any vendors of properties acquired in connection with the project have been asked to sign non-disclosure agreements, and if so, the rationale for this.

(c) Whether the cost comparisons presented in Document 7.19 (2023 Strategic Options Backcheck and Review) and Document 7.17 (2025 Strategic Options Backcheck and Review) include the full cost of all property acquisitions associated with the overhead line option.

Sulphur Hexafluoride (SF6) Emissions

My submission raised the use of Sulphur Hexafluoride (SF6) within the electricity transmission network. SF6 is 23,500 times more potent than CO2 as a greenhouse gas. I cited the Applicant's own reported annual leak rate of 1.33% and the resulting carbon-equivalent footprint, which I estimated as equivalent to approximately 170,000 additional petrol cars on the road each year.

This is directly relevant to the project's environmental credentials. The Applicant presents this as green energy infrastructure, yet the transmission network relies on a gas with extraordinary global warming potential. The destruction of natural carbon sinks (trees, hedgerows, and soils) to build infrastructure that leaks the world's most potent greenhouse gas raises a real question about whether the project's net environmental impact has been properly assessed.

The Applicant's response contains no mention of SF6. I ask the Applicant to set out the SF6 emissions attributable to this project and how these have been factored into the environmental assessment.

AC Technology Obsolescence and Constraint Payments

My submission raised a question about whether it is appropriate to build a new AC pylon network at a time when the energy system is moving to direct current (DC). Solar generation is DC. Battery storage is DC. Electric vehicles charge on DC. Data centres operate on DC. Meanwhile, the UK is paying billions of pounds annually in constraint payments to turn off wind farms because the existing AC network cannot handle peak loads efficiently.

The Applicant's response to HVDC alternatives focuses narrowly on capital cost differentials and the absence of commercially available HVDC circuit breakers. It does not engage with the broader strategic question: whether investing in AC overhead line infrastructure represents the right long-term technology choice, or whether it risks locking the UK into an increasingly outdated transmission architecture at enormous public expense.

The Eastern Green Link projects (subsea HVDC cables between Scotland and England) demonstrate that HVDC is a proven, deliverable technology for long-distance bulk power transfer in the UK. The Applicant has not explained why that approach is appropriate for those projects but not for this one. I ask for a response that addresses the strategic technology question, not simply the capital cost comparison.

Corporate Structure and Conflict of Interest

My submission noted that National Grid is a publicly listed company that generated over £4.5 billion in operating profit in its most recent financial year, with operating margins of approximately 38%. Its largest shareholders are institutional investors including BlackRock and the Vanguard Group. I raised the concern that the Applicant's primary fiduciary duty is to these shareholders, not to UK energy consumers or the communities affected by this project.

This matters because the Applicant is simultaneously the promoter of the project, the entity that will profit from building it (through the regulated asset base), and the party presenting the cost-benefit analysis that justifies the chosen delivery method. There is, at the very least, a perceived conflict of interest when a monopoly operator advocates for the most capital-intensive onshore option while dismissing alternatives.

The Applicant's response does not acknowledge this point. I am not saying that the corporate structure is inherently improper. But it is a relevant consideration when assessing how much weight should be placed on cost comparisons produced and presented by the same organisation that stands to profit from the outcome.

Failure to Monetise Permanent Environmental and Social Losses

In my original submission, I argued that the Applicant's cost comparison between overhead lines and alternatives (including offshore HVDC) is based purely on capital expenditure. The comparison assigns zero monetary value to the permanent losses created by the overhead line option, including:

- Loss of tourism revenue across a vast area of East Anglia
- Devaluation of residential and agricultural property

- Sterilisation of productive farmland
- Irreversible damage to the home environment of thousands of residents
- Mental health impacts, particularly on vulnerable and elderly populations

The Applicant's response includes a brief, generic paragraph on property devaluation, acknowledging that visual impact "may lead to perceptions of property value loss" and noting that compensation may be available under the Compulsory Purchase Code. This does not engage with my point. I am not seeking individual compensation. I am arguing that these permanent losses need to be quantified and included in the cost comparison between delivery options. A cost-benefit analysis that counts the capital cost of undergrounding or offshore delivery but assigns no value to the permanent damage caused by the overhead line option is incomplete.

I note the Applicant's position that Treasury Green Book methodology is not applicable to National Grid as a private entity. But the Planning Inspectorate and the Secretary of State, who will determine this application, are public decision-makers acting in the public interest. The fact that the promoter is a private company does not relieve the decision-maker of the need to consider the full range of costs and benefits, including those borne by the public.

Scale of Visual Impact

In my submission, I provided specific calculations on the scale of the visual impact of this project across the flat landscape of East Anglia:

- Over 200 square miles where a 50m pylon becomes the dominant landscape feature (approximately 1 mile radius)
- An area comparable in size to Dartmoor National Park where pylons would be prominent (approximately 2 mile radius)
- A total visual footprint roughly the size of the county of Kent or Suffolk (approximately 6 mile visibility in flat terrain)

The Applicant's response on landscape and visual matters is entirely generic, referring to the LVIA methodology and professional guidance. It does not engage with the cumulative, route-wide scale of the visual impact. The LVIA approach, by its nature, assesses individual viewpoints and character areas in isolation. My point was about the total visual transformation of a very large area of lowland England. I ask the Applicant to respond to these scale calculations specifically.

Inconsistency in Planning Controls for Listed Building Settings

I raised a specific point about the inconsistency between the strict planning controls applied to listed building owners (for example, being restricted to a 4ft open fence to preserve the visual setting from the roadside) and the absence of equivalent scrutiny when a 50m steel pylon is proposed within the setting of the same property.

This is not an abstract heritage policy point. It is a concrete example of a double standard in how the planning system treats individual householders compared to major infrastructure

promoters. The Applicant's response addresses heritage matters in generic procedural terms, referencing the Environmental Statement methodology and engagement with Historic England. It does not address this inconsistency. I ask the Examining Authority to consider whether the Applicant has given adequate weight to the settings of listed buildings along the route, when assessed by the same standards that would be applied to the occupiers of those buildings.

Political Narrative and Suppression of Objection

My submission raised a concern about the political and corporate narrative framing this project, specifically the assertion that any alternative will result in higher energy costs for consumers. At a time when energy costs are a serious burden on household budgets, this narrative has the effect of vilifying those who oppose the chosen delivery method. It creates community conflict and suppresses legitimate public objection.

The Applicant's response does not address this. I accept it is a difficult matter for them to respond to, but I ask the Examining Authority to be mindful of the power imbalance between a £60 billion multinational corporation and the individual residents and communities who are being asked to bear the permanent consequences of this project.

Precedent of Infrastructure Cost Overruns (HS2)

I drew a parallel with the HS2 project, where initial cost forecasts proved to be vastly optimistic and ultimately resulted in significant overruns and the curtailment of the project. I raised this to illustrate that the Applicant's cost projections should not be taken at face value, particularly when the Applicant is both the promoter and the beneficiary.

This point was not addressed. I repeat my suggestion that an independently audited, third-party cost analysis covering the full lifecycle costs of the proposed overhead line option and the leading alternatives would significantly improve the quality of evidence available to the Examining Authority and the Secretary of State.

In summary

The Applicant's thematic response addresses many of the broad topics raised across the Open Floor Hearings. However, a number of specific and important points from my submission have not been addressed. Several of these go directly to the integrity of the cost comparison that underpins the Applicant's case for overhead lines over alternatives.

I ask the Examining Authority to note the gaps identified in this submission, to invite the Applicant to respond to each of them directly, and to consider whether the cost evidence presented is sufficiently complete, transparent, and independently verified to support the conclusions drawn from it.

I remain willing to engage with the Examination process and to provide any further information the Examining Authority may need.

A final note on the burden of this process

Between attending public consultations, reviewing the original plans and route maps, engaging with National Grid representatives, preparing and delivering my oral submission, and now reviewing a 50 odd page response document to cross reference and identify what has and hasn't been addressed, I estimate I have invested significant personal time into this process. My time is not a free commodity, and I don't value it lightly. As someone who is self-employed, every hour spent on this process is an hour of lost income or time away from my family, given up simply to participate in a process that directly affects my local area and the wider community.

The Applicant has teams of salaried consultants, lawyers and planning professionals whose full-time job is to produce these documents. I don't begrudge them that, but the Examining Authority should keep this imbalance in mind. If the process demands this level of time and effort from individual residents just to keep up, then most people simply won't take part. The weight given to the volume of public response should reflect that. Silence does not mean consent. It may simply mean that people have run out of hours in the day, or are fearful of backlash from those who bought into the whole 'everyone's energy bills will go up, this is the only option that prevents that' narrative that National Grid used in their TV interviews and News coverage.

Matt Day

Interested Party

Roydon, Norfolk