10 February 2025. RIIO3@ofgem.gov.uk

**Submission to Ofgem’s call for evidence RIIO3[[1]](#footnote-1)**

a. Organisation: Chesterfield Willington Project

b. Commenting on National Grid Electricity Transmission’s (NGET) RIIOT3 business plan[[2]](#footnote-2)

c. Response is not confidential

d. Issues identified and e. evidence or justification, below, as follows:

We set out in this document our concerns that NGET’s business plan pledges are not reflected in reality, with examples below:

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| **NGET’s pledges to communities** | **Our experience with the Chesterfield/Willington project** |
| it is consulting with communities early in the planning process | Not the case. NGET consulted after it had decided on a preferred option and discarded other options. |
| We make changes to our proposals where possible and if we cannot, we explain why | The changes sought by stakeholders including local communities, parish councils, district councils, County Councils and MPs were:   * for HVDC undergrounding the entire route. This has not been investigated by NGET despite being technically feasible, popular, less harmful to the environment, less harmful to businesses including tourism and agricultural and potentially cheaper over the lifetime than pylons * and integrated offshore grid. This has not been explored by NGET despite offering known cost-savings and reductions in infrastructure. Data used for best method of conduct was a report and method statement from 2012. |
| We are deploying digital tools, like 3D visualisations, to make it easier for people to engage with the developments we are proposing for their communities.  Digital (5.2). We enhanced our digital channels to improve customer experience by providing more information through the connections process. For our ASTI projects, we are using state-of-the-art 3D models and virtual reality headsets to show the public how proposals could look in the local landscape | The only 3D tools available have been via a single screen at public information events, with no information to take away. This meant that only people who were able to attend an event could see the impact of the project. Given that the events were mostly during working hours and some at a distance from the route/communities, this severely restricted numbers who could understand the impact of the Chesterfield to Willington project.  Further, some of the visualisations contained in the Statutory consultation pack were of an incredibly poor standard to the extent that 50m-high pylons were shown to be much smaller than trees.  The ‘engagement’ by Argent was so low key, there is an argument to suggest the requirement to engage didn’t not meet the criteria required for such a project. |
| We aim to deliver the highest standards of public consultations and community relations so we can develop infrastructure proposals that are shaped by local input and create a greater level of community acceptance | Your aim isn’t good enough. Our communities along the desired routes have not been inform correctly, openly and independently of conflict we have discovered. |
| We try to make it convenient and easy for local communities to find out about our planned network upgrades and to tell us what matters to them | NGET has made it very difficult for people. The majority of the drop-in events were during working hours. Many of them were far from affected areas. Many were accessible only by car. Answers to questions were hard to come by. |
| Online webinars, community update newsletters, social media advertising, consultation documents and information in local libraries, briefings for parish councils and elected members, one-to-one stakeholder briefings, telephone call-backs and language translation where necessary, really help we reach as many people as possible in the community | The webinars we lame, not published openly as they could nor in all the various formats to all sectors of the communities. The webinars we all one way no actual open answers and questions, the panels always selected to read only a few typed questions. All the webinars were cut short and the majority of older folk could not attend. Furthermore most were around 6pm in the evening in rush hour, again making the target audience reduced and targeted.  The period of time between announcing face to face was short. The announcement of when webinars were was short and confusing for must, if they could log on. |
| Building trust through data transparency C4.4  Customers and stakeholders told us at our pathway to net zero events they need data from all industry players, and data needs to be more accessible, and once published, the datasets must be accurate for practical use | * Redacted data in business plan; * Non-publishment of Investment Decisions Pack, Engineering Justification Papers and CBA with the business plan for stakeholder scrutiny; * Refusal of NGET to share risk register * Argent Business Risk checks suggest the contract worth is larger than Argent are geared and insured for according to Lloyds of London. * not only is their figure out of date, but does not take into account modern technology and recent innovations in the field taking into account different lengths of span and different terrain. As NG are choosing primarily agricultural land costing should be updated which NG refuse to do. OFFGEM have reportedly got a £500m fund to enable some overhead lines to be removed and replaced with undergrounding. The 2022 scheme in Dorset, says that 8.8km of pylons were removed and replaced with undergrounding using modern equipment including drilling under roads, through different terrains, building haul roads to remove pylons at a total cost of £118m. This equates to £13.4m per kilometre, one third of NG stated comparable costs. Undergrounding only, on this basis, we can reasonably assume that the cost could be £9m to £11m per Kilometre which equates to 2.5 to 3 times that of constructing pylons. Rendering NG forecast costs to be completely unrealistic and reduces the timescale required by avoiding community opposition, court battles and property compensation. Yes undergrounding is more expensive but not the 10 to 20 times quoted by National Grid. Relating this cost to every household in Derbyshire could mean as little as £1 per household per month on energy bills. Maintenance costs would be approximately the same, furthermore, overhead lines lose energy whereas cables underground doesn’t lose as much, but, an undergrounding fault maybe more difficult to find and repair but has better outcomes for the environment. Undergrounding uses larger cabling and therefore has the capacity to increase energy throughput. NG suggest that the width of ground required for undergrounding is between 130 to 150 metres wide, whereas an independent report in march 2024, details a typical construction swathe (including haul roads) is 33m. Ironically this is National Grids “go to” policy for National Parks and Areas of Outstanding Beauty. There is scope for a composite approach of overhead – underground and overhead but this approach would require a “ceiling End Compound” (approximately the size of half a football pitch) or some intermediate staging for longer lengths. Where rivers and roads are encountered, “horizontal drilling” would be needed. Another significant option is “Cable Ploughing” , this emerging technology has been used in continental Europe and more recently in Wales. In one operation, a trench can be ploughed, a cable inserted and the infill of the land can return the field to agricultural use in just one week. HVDC cabling is an option, but converting DC to AC for domestic use is very expensive. It should also be noted that pylons at 50m tall are roughly double the height of those in existence today, however they are over 9 times the volume and the 75m pylons far exceed that volume. |
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1. <https://www.ofgem.gov.uk/sites/default/files/2024-12/RIIO-3_Call_for_Evidence.pdf> [↑](#footnote-ref-1)
2. https://www.riiot3.nationalgrid.com/document/30069/download [↑](#footnote-ref-2)