10 February 2025. RIIO3@ofgem.gov.uk

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

a. Organisation: Pentrich Parish Community

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 to Willington EDN-2 Upgrade project** |
| it is consulting with communities early in the planning process | Not the case. NGET consulted local stakeholders only 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. Instead, an ‘offshore solution’ between Norwich & Tilbury was priced up but with very limited information and not consulted on. |
| 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 N2T 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. |
| 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 | We have set out since 2022 over three separate NGET consultations that we have serious concerns about NGET’s consultations. We have three legal opinions to date which state that the process is legally deficient. We will shortly receive a consultation best practice review by Rhion Jones, the ‘Consultation Guru’. And we have written our own extensive submissions about the flaws in the consultations and held two surveys of participants. Our reports can all be read here: <https://pylonseastanglia.co.uk/reports/>  There is no community acceptance of the N2T proposal as presented. Community relations are very poor. |
| 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 | We have had to push for inclusion of local Parish Council involvement. This was arranged by local MP who agreed to chair with NG team.  Limited information or response to questions raised feeling of lip service only offered. |
| 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 * Refusal to share granular costings, need for Lincs CC to use legal letters to ask for info * NGET’s media spokespeople are often economical with the truth, for example, regularly stating that government policy requires them to build pylons and that undergrounding costs anything from 4 to 14 times the cost of overhead lines. You will find our letter to John Pettigrew in Appendix A. * Incorrect evidence supplied to NESO’s East Anglia Study 2024, that a shortage of HVDC cables would delay an HVDC solution. Yet NGET’s business plan shows it is managing supply successfully. With 14,000km of cable purchased, there is no reason why HVDC could not be used for N2T:   ***"****In the case of HVDC orders, this has resulted in our supply chain partners investing in a new factory, a new ship and a significant expansion of a UK facility on the back of the long-term order book certainty we have given them." “£9bn HVDC frameworks to help us invest on an unprecedented scale across NGET and the National Grid Group. This includes procuring over 14,000km of cable, a third of global market capacity.”*  *Please also see Appendix B for evidence that global HVDC suppliers are ramping up production to meet demand.* |

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)