

# Submission to Ofgem's call for evidence, RII03<sup>1</sup>

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- b. Commenting on **National Grid Electricity Transmission's** (NGET) RIIOT3 business plan<sup>2</sup>
- c. Response is not confidential
- d. Issues identified and e. evidence or justification, below, as follows:

	Page
Key Ofgem requirements relevant to this submission	2
How NGET presents its business plan	4
<b>Stakeholders and communities</b>	5
<b>Environment</b>	16
<b>Transparency and strategy, including East Anglia</b>	21
<b>Conclusions</b>	26
Appendix A: mitigation hierarchy	27
Appendix B: letter to John Pettigrew	28
Appendix C: consultation letter	29
Appendix D: suppliers of HVDC cable	30

We set out in this document our concerns that in some instances NGET has not complied with Ofgem's requirements at all and that in other cases what is set out in the business plan has not been reflected in reality. Our three key concerns are around stakeholders and communities in the delivery of transmission infrastructure; the approach to the environment and biodiversity in the delivery of transmission infrastructure and lack of transparency. We draw on specific examples from the Norwich to Tilbury (N2T) project. We also highlight concerns that NGET's business plan risks failing to deliver Ofgem's key outputs of: infrastructure fit for a low-cost transition to net zero; secure and resilient supplies; high quality of service from regulated firms and system efficiency and long-term value for money. Our evidence, including our national survey, demonstrates that NGET does not reflect stakeholders' views, nor ensure that they are at the heart of its plan.

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<sup>1</sup> [https://www.ofgem.gov.uk/sites/default/files/2024-12/RIIO-3\\_Call\\_for\\_Evidence.pdf](https://www.ofgem.gov.uk/sites/default/files/2024-12/RIIO-3_Call_for_Evidence.pdf)

<sup>2</sup> <https://www.riiot3.nationalgrid.com/document/30069/download>

# Key Ofgem requirements for RIIO-T3 relevant to this submission

Our particular interest to us is communities/stakeholders and the environment. We highlight the key expectations Ofgem has of transmission operators:

## Communities

We note that the call for evidence states that **Ofgem expects, “companies’ BPs to reflect stakeholder views and ensure they are at the heart of their plans. We will assess the BPs during 2025, considering the needs of existing and future consumers, and meeting the UK's statutory net zero target and five-year carbon budgets.”** (Paragraph 5)

The guidance also focuses on transparency and stakeholder engagement, seeking an enhanced engagement framework to ensure that consumers and stakeholders remain at the heart of their RIIO-3 business planning process, ongoing delivery and decision making (2.1). Under 4.38 Communities and engagement, Ofgem asks if impacted communities been engaged in the process to develop projects.

We demonstrate in this submission how stakeholders are not at the heart of NGET’s plans. Ofgem may ask the Independent Stakeholder Groups (ISGs) to review specific areas of the business plans if we decide there is a particular need or significant consumer or stakeholder interest (2.5). We believe that this must happen, for reasons which we set out in this document.

## Environment

Each company should have an Environmental Action Plan (EAP) (4.49) and there is a minimum level of ambition (4.48) for how to mitigate environmental impact. In addition, the RIIO-3 Sector Specific Methodology Decision – ET Annex<sup>3</sup> says that (1.26) the TOs will be pushed to further minimise their impact on the environment. It notes that (1.20) this new ET network investment must not come at the expense of network reliability or the environment.

Notably, it states:

*“Our aims for RIIO-ET3 environmental performance are: to mitigate environmental impacts that arise from network activities and increase transparency of the TOs’ actions and plans to decarbonise their networks in line with net zero; and, to ensure that the TOs consider biodiversity and the climate crisis in new construction and mitigate environmental impacts of construction.”* (2.284)

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<sup>3</sup>[https://www.ofgem.gov.uk/sites/default/files/2024-07/RIIO-3\\_SSMD\\_ET\\_Annex.pdf](https://www.ofgem.gov.uk/sites/default/files/2024-07/RIIO-3_SSMD_ET_Annex.pdf)

We demonstrate in this submission that NGET is not transparent about the carbon impact of transmission proposals, nor does it appraise alternatives for their carbon and natural capital impact. Natural capital does not feature at all, and NGET has not produced a biodiversity report, a government requirement by January 2024. We can prove through the N2T project that ET network investment will come at the expense of the environment. However, the grid upgrade does not need to be so harmful if biodiversity and natural capital are explicitly included, and the mitigation hierarchy (see Appendix A) are followed.

## Other key outputs

In addition, key outputs and incentives (set out in 3.23 of *Ofgem's Business Plan guidance*<sup>4</sup>) are:

- infrastructure fit for a low-cost transition to net zero;
- secure and resilient supplies;
- high quality of service from regulated firms;
- and system efficiency and long-term value for money.

Under 'Strategic optioneering approach' (4.30) Ofgem states that it wants "to understand the methodology for evaluating a wide range of potential options and strategies to determine the most effective and efficient engineering solution for a project." And 4.31 Ofgem wishes "to understand how licensees achieve an appropriate balance between competing interests" such as economic (best value for existing and future consumers), environmental and social considerations, future-proofing timings and risks.

We do not believe that NGET has achieved an appropriate balance between competing interests. Impacted communities (particularly rural communities) and nature (which can be viewed as a stakeholder) are disproportionately affected and unheard. We know from our specific experience that alternative transmission options to those proposed by NGET can achieve a better balance and can provide better economic value, environmental benefits, future-proofing and less risk. Instead, we risk seeing much infrastructure that is not fit for a net zero future and not value for money.

We do not believe that NGET has met Ofgem's criteria above and will address these in the pages that follow.

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<sup>4</sup> [https://www.ofgem.gov.uk/sites/default/files/2024-07/RIIO-3\\_Business\\_Plan\\_Guidance.pdf](https://www.ofgem.gov.uk/sites/default/files/2024-07/RIIO-3_Business_Plan_Guidance.pdf)

# How NGET presents its business plan

At webinar 14 Jan 2025:

- *NGET will work with stakeholders and communities that host infrastructure*
- *NGET is committed to delivering value to communities and stakeholders*
- *NGET wishes to ensure legitimacy, with community acceptance and support*
- *NGET wishes to deliver what matters for communities that host infrastructure*
- *NGET's Future Network Blueprints reflect what stakeholders want*
- *NGET wishes to deliver a nature positive future*
- *NGET has three ambitions: Deliver the grid of tomorrow, today; Do the right thing for consumers, communities and the environment; Transform the way we work*

**We set out in this submission how the reality of these promises does not match the above.**

Our (volunteer-run) group felt obliged to commission, at our own significant cost, a nationally representative survey by marketing insight professionals, Norstat, and we include the results. Perhaps most illustrative, however, is the result of a Facebook poll run during recent weeks, in which we asked: “To what extent do you trust National Grid to do the right thing for communities and nature?”. 99% (of 600 respondents) answered, “Not at all”.

It is imperative that Ofgem takes a careful look at our evidence and, in addition, requests that National Grid's Independent Stakeholder Group (ISG) reviews the areas of the business plan we highlight concerns about. This option is set out in paragraph 2.5 of Ofgem's Business Plan guidance when there is a ‘particular need or significant consumer or stakeholder interest’. In this case, all three apply. Finally, we cannot see evidence in the business plan that the Equality Act 2010 has been taken into account.

# Stakeholders & Communities

In this section, we look at:

- Public opinion, according to NGET
- National research by other organisations
- Our own national public opinion survey
- Community acceptance (Chapter 4, business plan)

## Public opinion, according to NGET

**We have concerns about how the stakeholder groups were selected, what they were asked (and not asked) and what national research was taken into account. It seems that there is a strong bias away from rural stakeholders and communities directly impacted by transmission upgrades in NGET's research.**

Our specific concerns relating to the NGET Business Plan and accompanying reports are set out below:

- There were no rural events held by Yonder. The urban areas chosen are not those at the frontline of the infrastructure build. Yonder Consulting<sup>5</sup> carried out analysis of transcripts derived from the regional stakeholder events hosted by National Grid in Cardiff, Cambridge, Manchester, Exeter, Leeds and London. Despite this, Yonder results show priority attached to “Protecting and improving wildlife/natural environments” & “Reducing the visual impact of National Grid’s infrastructure”
- Unlike in the 2012 Willingness to Pay report<sup>6</sup>, there appears to be no questioning of the those at the urban events held by NGET to determine whether they ‘use the countryside’ or to what extent stakeholders are willing to pay for different grid options.

This is important because, in the Rapid Review, Sustainability First<sup>7</sup>, *“those in rural areas appear to put a higher value on visual impact and nature and wildlife. This may be as they have a higher stake in the environmental wellbeing and sustainability of their community, a greater connection to nature, and a strong sense of place, including local heritage.”* Given that rural areas are disproportionately affected by transmission infrastructure, it is very important not to neglect rural users, rural dwellers and rural businesses.

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<sup>5</sup> <https://www.riiot3.nationalgrid.com/document/30081/download>

<sup>6</sup> <https://www.nationalgrid.com/electricity-transmission/sites/et/files/documents/Willingness%20To%20Pay%20Report%202012.pdf>

<sup>7</sup> <https://www.riiot3.nationalgrid.com/document/30091/download>

- Mintel's 'Consumer Environmentalism'<sup>8</sup> study did not include questions about biodiversity and nature's decline, so we are unable to ascertain what importance those surveyed place on it. This contradicts NGET wishes to deliver a nature positive future.
- There is no evidence<sup>9</sup> that businesses (especially agricultural and tourism) particularly impacted by transmission infrastructure were asked for their feedback about the impact of transmission projects.
- We asked NGET<sup>10</sup> how the 23,000 residents in 'already' impacted communities were selected or what they were asked. This is NGET's response: *"the 23,000 figure refers to community residents who we have met with related to our Great Grid Upgrade projects (the collective number of people who have attended public exhibitions, webinars and public consultation events). Many more have been contacted via newsletters, emails and through local and regional media. Given this figure relates to public consultations on specific infrastructure projects and not engagement on our entire business plan we have not published a breakdown as part of our submission. Individual project planning submissions will include detail on our public consultations in line with planning act requirements."*

Yet we know from the engagement with residents on the N2T project that the overwhelming majority are not in favour of the overhead lines proposal and have been repeatedly, since 2022, during three consultations and in between, asking for alternatives that are better for consumers, communities and the environment. To cite these figures in no way demonstrates support for NGET's Business Plan. This engagement cited by NGET has been a one-way process of broadcasting its messages to the public. It cannot be defined as consultation, and we have three legal opinions which cite that the N2T consultation process has been deficient.

- In NGET 2024's Consumer affordability<sup>11</sup> study, although costs were deemed very important, it is clear from the Rapid Review that other things do matter: "protecting wildlife and nature, visual impact, tackling pollution, reducing carbon emissions"
- NGET's consultants do admit that lack of knowledge of grid related issues makes stakeholder surveys difficult, yet there has been no attempt to educate participants about different options for upgrading the transmission network, nor on the impacts and implications of the concomitant reduction in ecosystem service generation and delivery so that they can make educated decisions. There seems to be a bias by NGET (including its consultants) towards pylons, when there are in fact numerous solutions including AC undergrounding, DC undergrounding (both via trenching, ploughing or drilling, all with different impacts and costs); upgrading the existing grid using most up-to-date technologies, and integration offshore.
- There has been no attempt by National Grid to quantify socio-economic impacts nor natural capital impacts, thus this information is not available to stakeholders to make an informed decision. As Ofgem will be aware, we have been repeatedly arguing for the use of the Treasury Green Book for his analysis to ensure balanced and fair decision-making for consumers and all stakeholders. In fact, we believe this is the only way to resolve the

<sup>8</sup> <https://www.riiot3.nationalgrid.com/document/30086/download>

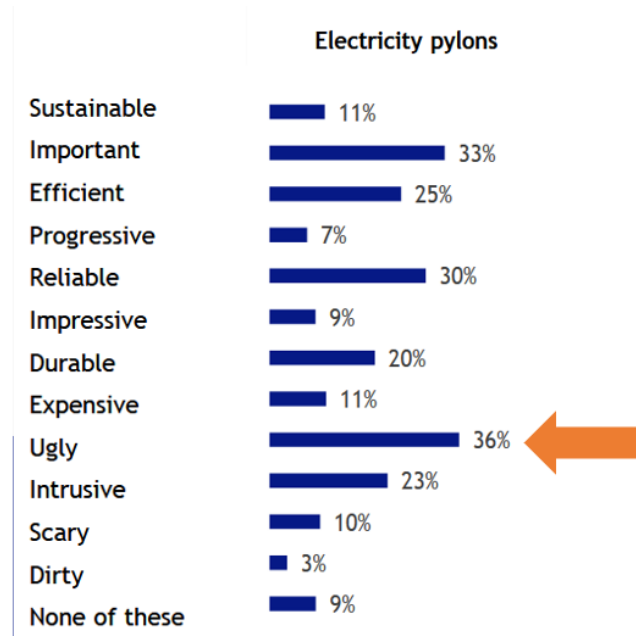
<sup>9</sup> <https://www.riiot3.nationalgrid.com/document/30013/download>

<sup>10</sup> [pathwaytoNZ@nationalgrid.com](mailto:pathwaytoNZ@nationalgrid.com)

<sup>11</sup> <https://www.riiot3.nationalgrid.com/document/30096/download>

“Tensions and trade-offs” referenced on p21 on NGET main report. There needs to be HM Treasury Green Book comparison between the true cost of the proposed pylon scheme and alternative solutions such as offshore and HVDC underground technology. Only by including aspects such as natural capital and socio-economic impacts can the solution that causes the least harm be determined. Ignoring this results in unnecessary and unquantified harm. Completely ignored by NGET is harm to public health and wellbeing. It is not good enough, nor is it responsible, to simply dismiss these harms in the guise of green energy. Doing so also damages trust and, with it, public support for the transition to net zero. This must be considered against a backdrop where nature is already in severe decline. As outlined in the 2023 State of Nature<sup>12</sup> report *“the UK is now one of the most nature-depleted countries on Earth”*

- Visual impact of pylons. The visual impacts of pylons have been widely recognised through the previous Visual Impact programme, which removes pylons. Three ongoing VIP projects are in RIIO T3 (Para 4.3). Mintel’s study found that electricity pylons are thought to be ‘ugly’ and ‘intrusive’ and in fact ‘ugly’ was the most frequently chosen word. In addition, it found *“a strong desire for infrastructure to have minimal visual impact on the landscape.”*



<sup>12</sup> [https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report\\_2023\\_FULL-DOC-v12.pdf](https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf)

Despite the lack of focus on nature, biodiversity and the environment in NGET's research, the environment did score highly (summarised in Figure 26, UK public electricity network priorities), with two of the five key take-aways being that the environment is still critical and that improving the natural environment is slightly higher in the priority list to net zero or reducing our greenhouse gas emissions. *(This is a slight misquote by NGET as it should also say 'Protecting', the natural environment as per the question – this is an important distinction to make).*

It has also been disappointing and concerning to discover, in an academic study, 'Putting Pylons into Place', from 2013<sup>13</sup>, relating to the NG Hinkley Connection that issues experienced in the N2T consultation process are not new and that lessons have not been learnt. The process was flawed from the outset by not properly and openly consulting on multiple options and not doing so in a manner that was respectful to the level of technical detail participants needed to fully understand potential options.

That research stated *"The findings challenge the 'not-in-my-back-yard' assumption that citizens are selfish place-protectionists that lack the technical sophistication necessary to take a strategic viewpoint on transmission system development. They also reveal how decision making under the former UK Infrastructure Planning Commission's (IPC) (and its successor body the Planning Inspectorate) presents a challenge to procedural justice, as **front-loaded developer-led consultation practices curtail citizen input to key decisions on alternative technologies (for example, underground or undersea lines). This is likely to exacerbate public mistrust of transmission system operators and provoke further organised protest.**"* (It is also to be noted that the NG Hinkley Connection project consulted on multiple distinct routes, not one as for N2T).

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<sup>13</sup> Putting pylons into place: a UK case study of public perspectives on the impacts of high voltage overhead transmission lines. Matthew Cotton and Patrick Devine-Wright. Journal of Environmental Planning and Management Vol. 56, No. 8, October 2013, 1225–1245



## National research by other organisations, including DESNZ<sup>14</sup>

Nationally, the British countryside and natural environment are cherished and valued, as demonstrated by a series of polls and reports:

- Most notably, the **DESNZ Public Attitudes Tracker**<sup>15</sup>, Summer 2024 UK, found that 30% would be unhappy about new electricity infrastructure in their area. This was a higher proportion (35%) in rural areas than urban (23%) which gives further credence to our points above about the limitations of NGET's research. 7% felt that electricity infrastructure would not be feasible in their local area. Those who said they would be unhappy to see more electricity network infrastructure built locally cited the main concerns as follows: impact on the view (61%), impact on local plant and animal life (58%, no change), concerns about the impact on health (45%), noisy infrastructure (40%), and disruption during construction (38%). Again, those in rural areas were more likely to express concern e.g impact on the view (68% rural vs 59% urban), the effect on local plant and animal life (67% vs 55%), and concerns about the local economy (21% vs 12%). Strikingly, only 26% of respondents felt they know a lot or fair amount about grid infrastructure (rural areas had greater knowledge than urban)
- **Several national polls have shown the importance of countryside and green spaces.** **Polling for Future Countryside**<sup>16</sup> showed that British people are incredibly proud of our countryside (second only to the NHS) with almost everyone (93%) agreeing that it should be regarded as part of our national heritage. A majority of people (54%) don't feel the countryside is being taken seriously enough by the Government, and three-quarters (75%) want more political debate on the challenges facing rural areas. **Polling for YouGov** in 2022<sup>17</sup> found that Britain's natural beauty is the second most important thing to Britons (after the NHS). **Polling** by More in Common **for the Community Planning Alliance**<sup>18</sup> showed 78% in favour of protecting nature and green spaces when it comes to the governments housing policies; 'In a **WW Utilities 2024 report**<sup>19</sup> the environment scored highly, with 79% rating it important/very important.

Yet, despite the importance of the countryside and nature to the British public, it appears that no questions were asked of stakeholders about the need to protect biodiversity and landscapes, nor about alternatives to pylons. Questions asked of stakeholders were not about whether the best solution should be chosen and what that might mean. Why have important background studies such as the DESNZ Public Attitudes Tracker been taken into account in NGET's business plan? Why have rural areas not been distinguished in research as being in need of more detailed research? Why hasn't more been done by NGET to ensure that the public understand the real trade-offs, with transparent information.

<sup>14</sup> Department for Energy Security & Net Zero

<sup>15</sup> [DESNZ Public Attitudes Tracker: Energy infrastructure and energy security, Summer 2024, UK - GOV.UK](#)

<sup>16</sup> [Public opinion polling on the British Countryside — Future Countryside](#)

<sup>17</sup> [What is the best thing about Britain, according to Britons? | YouGov](#)

<sup>18</sup> [Homes-For-Everyone-Briefing.pdf](#)

<sup>19</sup> <https://www.wwutilities.co.uk/media/5871/wwu-willingness-to-pay-research-2024.pdf>

## Our own national opinion public survey

To add a more balanced perspective, we carried out our own national survey<sup>20</sup> of 1000 adults, using marketing agency Norstat UK.

The answers get to the crux of the issues that have not been addressed by NGET, showing very strong support for the need to prioritise food security and nature, and to protect countryside, in the grid upgrade.

The survey shows extremely strong public support for alternatives to pylons and for full compensation for affected parties. Moreover, it confirms our suspicion that the general public simply has no idea of the level of pylons construction destruction, thus opinions in other surveys may be skewed in favour of pylons. Finally, the vast majority do not want to live near a pylon.

These issues are of great importance to the general public, across regions, genders and age groups but have not been addressed in NGET's business plan.

1. How strongly do you agree that we should **protect food security and nature** in the 'great grid upgrade'? **88% Strongly Agree-Agree**
2. Do you agree that the **British countryside** is important? **94% Strongly Agree-Agree**
3. How strongly do you agree that we should be doing the following during the 'great grid upgrade':
  - a. **Upgrading the existing grid** before building new infrastructure. **80% Strongly Agree-Agree**
  - b. **Burying cables** **70% Strongly Agree-Agree**
  - c. **Coordinating sub-sea cables** to reduce the number of them **76% Strongly Agree-Agree**
  - d. **Building pylons** **33% Strongly Agree-Agree**

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<sup>20</sup> The survey was introduced as follows: "The "Great Grid Upgrade" is a project to improve the electricity network in the UK. It is needed because more power is being generated from renewable energy."

## Pylons East Anglia survey, cont/d

4. Choose the words that most accurately reflect your opinion of pylons:

Ugly 29%	Attractive 7%	Industrial 23%	Functional 28%	Out-dated 9.5%	Modern 3%
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5. Would you **buy a house near a 50m pylon** (as tall as Nelson's column)? **Only 13% said yes.**

6. Do you think that homeowners and businesses impacted by the 'great grid upgrade' should be **fully compensated for any financial loss** they suffer?

**Always, mostly 80%**

7. Are you aware that the construction of pylons requires the **destruction of all trees and hedgerows across a strip up to 80 metres wide** for the entire length of the pylons route? **No 62%**

## Community acceptance (Chapter 4, business plan)

We set out in the table below how our experience with the N2T project demonstrates that NGET is not adhering to pledges made in its Business Plan.

<b>NGET's pledges</b>	<b>Our experience with the N2T project</b>
...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	<p>The changes sought by stakeholders including local communities, parish councils, district councils, County Councils and MPs were:</p> <ul style="list-style-type: none"> <li>- 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. NGET is refusing to countenance discussions about the HVDC option despite saying in its business plan (p36) that it commits to "C3.2 Deliver our ASTI and other major projects through our new collaborative and integrated High Voltage Direct Current (HVDC) Framework and Enterprise Delivery Model</li> <li>- 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 &amp; Tilbury was priced up but with very limited information and not consulted on. This was after the event, sent only to the 'Offset' MPs, and due to pressure by MPs.</li> </ul>
<p>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.</p> <p>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</p>	<p>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.</p> <p>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 or the same size as telegraph poles.</p> <p>Virtual reality was not used by NGET for the N2T (ASTI) project statutory consultation public information events. The 3D CAD models presented were also far removed from the current "state-of-the-art" and were not fit for purpose thus depriving the public the opportunity to properly understand the impact. The buildings were represented as simple grey blocks, which desensitised the context, meaning for example that the historic character of impacted buildings was not apparent. The corresponding images of the landscape were also unclear, making it extremely difficult to obtain bearings and relate the proposals to the baseline environment. The towers and overhead cables also did not appear as prominent in the screen images as they are in real life (as was evident when comparing with existing 400kV OHLs). Other issues</p>

	<p>included a very restricted choice of viewing elevation, and it was not possible to show “fly throughs” or “birds eye” views to help understand the full impact of the scheme. Much higher quality 3D CAD models have been in use for some time on other large infrastructure projects. For example, those presented by North Falls for the proposed windfarm and substation were much more detailed and realistic. Local buildings were for example easily recognisable and 3D views from any elevation were available. Examples can be seen on the supplier’s website.</p> <p>The North Falls visualisations were produced by 3DW <a href="https://www.3dwtech.co.uk/">https://www.3dwtech.co.uk/</a></p>
<p>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</p>	<p>We have set out since 2022, during 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: <a href="https://pylonseastanglia.co.uk/reports/">https://pylonseastanglia.co.uk/reports/</a></p> <p>There is no community acceptance of the N2T proposal as presented. Community relations are very poor.</p> <p>We also note that we have not been invited to respond to NGET’s current consultation on Stakeholder, Community and Amenity Policy. This should be a public consultation for all interested, not a selective process. We include the letter in Appendix C.</p> <p>We felt obliged to refer NGET to the Competition and Markets Authority in 2022 for its misleading claims, and we have twice written to the Chair of the Board raising concerns about NGET’s activities.</p>
<p>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</p>	<p>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.</p> <p>Note that in the Norwich to Tilbury 2022 Non-statutory Consultation Feedback Report, NG presented the following findings from the previous consultation:</p> <p>When respondents were asked to rate how well the consultation was promoted and advertised to the public, “...the largest proportion of respondents (51%) who answered this question thought that it was ‘Very Poor’. A further 18% of respondents selected ‘Poor’”.</p> <p>When respondents were asked to rate the information included as part of the consultation in terms of how clearly it was presented and how easy it was to understand, “...53% of respondents thought that the materials were poor, with 15% that selected ‘Poor’ and 38% that selected ‘Very Poor’”</p>

<p>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</p>	<p>One recent example of poor communication by NGET with relation to N2T is in January 2025. NGET simultaneously sent a letter to Norfolk &amp; Suffolk County Councils notifying them that the Waveney Valley undergrounding option that had been investigated would not be pursued, and a community newsletter<sup>21</sup> to householders updating them on the project that did NOT mention the Waveney Valley decision. This is insulting to communities affected by the project.</p> <p>In the same newsletter the following questions were answered by NGET in a way that deliberately misses the point or glosses over the topic or simply patronises the public:</p> <p>Q <i>Why don't you upgrade the existing lines?</i> Did not answer previous community questions which related to the use of 'super conductors' such as TS Conductor (part-owned by NGET); HVDC overhead lines; and advanced technologies. (This is despite RIIO-T3 Innovation Annex (Annex 09) stating: "<i>We will also trial and roll out next generation conductors such as TS Conductor which provide the potential to increase network capacity in the face of growing demand. Additionally, TS conductor allows for shorter towers and wider spans for new build projects resulting in improved planning and consenting speed</i>")</p> <p>NGET has never explained why the existing infrastructure at Bradwell-on-Sea cannot be upgraded, perhaps as an HVDC landing point which continues underground replacing the disused pylons, to a converter station nearer to demand.</p> <p>(Although the East Anglia section of the business plan notes that 24% of OHL in the region have been upgraded there is no analysis of by how much, which lines, what remaining potential there is).</p> <p>Q <i>Why can't you connect the wind farms offshore?</i> Does not answer communities' question, which has always been about coordination offshore to reduce overall infrastructure onshore and sub-sea. All evidence points to the fact that coordination offshore brings overall cost savings versus NGET's preferred radial model. National Policy Statement EN-5 requires coordination. It is possible to coordinate offshore and to build energy platforms (or islands) as our continental neighbours are doing just this. Therefore, NGET needs to address this question properly.</p> <p>Q <i>Wouldn't building an offshore grid be quicker and cheaper?</i> As always, this answer also misses the point as it talks about a point-to-point connection between Norwich and Tilbury, not coordination offshore which is what communities have always stated is the obvious and optimal solution (as supported by numerous independent studies since 2011).</p> <p>Q <i>Are underground HVDC cables cheaper?</i> The answer given is an outright lie, because HVDC undergrounding is NOT 5-10 times more expensive than cables. NGET itself, for Eastern Green Link 3 &amp; 4, states: "<i>The required</i></p>
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<sup>21</sup> <https://www.nationalgrid.com/electricity-transmission/document/156931/download>

	<p><i>capacity HVDC links over the proposed distance have comparable capital costs, but much lower lifetime costs than the alternative onshore AC option in this case.”</i> In the NESO East Anglia Study, HVDC was found to be very favourable in cost compared with OHL’s. Finally, OHL’s have not been fully costed by NGET and do not include significant costs such as community benefits or BNG or full compensation or a suitable level of contingency. By our estimates, N2T as proposed by NGET will cost between 4 and 8 times the figure presented. We set out all the comparisons in our Leaders not Laggards<sup>22</sup> report.</p>
<p>Building trust through data transparency C4.4</p> <p>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</p>	<p>Public trust in NGET is low for reasons that include</p> <ul style="list-style-type: none"> <li>- Redacted data in business plan;</li> <li>- Non-publishment of Investment Decisions Pack, Engineering Justification Papers and CBA with the business plan for stakeholder scrutiny;</li> <li>- Refusal of NGET to share risk register;</li> <li>- Refusal to share granular costings (need for Lincs CC to use legal letters to ask for info).</li> <li>- 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 B.</li> <li>- 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:</li> </ul> <p><i>“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.”</i></p> <p>Please also see Appendix D for evidence that global HVDC suppliers are ramping up production to meet demand.</p>

<sup>22</sup> <https://drive.google.com/file/d/16QyXScRg8IPFb53cO2gTykBpiciM8fFj/view?usp=sharing>

# Environment

NGET does not attempt to avoid harm to the environment by quantifying harm or assessing the impact of alternatives on the environment (to include carbon, natural capital, ecosystem services). There is no mention of the mitigation hierarchy, natural capital, ecosystem services or the Treasury Green Book in NGET's main Business Plan. The Environmental Action Plan does contain some references to natural capital and ecosystem services but with no supporting evidence or attempts to avoid harms to natural capital. Likewise, the mitigation hierarchy is referred to in the EAP but is conflated with BNG, when the two are in fact distinct and the mitigation hierarchy must be followed such that, in sequence, harm is avoided, minimise, remediated/restored and only as a last resort compensated or offset. When it comes to BNG, the guidelines are specific about first requiring avoidance as follows, "in relation to onsite habitats which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from the development." Paragraph: 008 Reference ID: 74-008-20240214

<b>Ofgem requirements</b> Ofgem's minimum requirements are set out in Figure 24 of NGET's Environmental Action Plan. Those of relevance are below:	<b>What National Grid says in the Business Plan</b>	<b>Our comments</b>
<b>Business Carbon Footprint (BCF):</b> <ul style="list-style-type: none"> <li>- Appropriate Science Based Target</li> <li>- Commit to efficient and economic actions to reduce controllable BCF &amp; report on this using GHG Protocol Corporate Accounting and Reporting Standard</li> </ul>	To decarbonise our own operations, we have set a Science-Based Target (SBT) in line with keeping global warming to 1.5 degrees. Without intervention during RIIO-T3, we would expect emissions to increase as our construction portfolio is growing.	Nothing to compare how different construction projects fare from a carbon or biodiversity perspective e.g. steel construction, transportation; concrete for bases; soil carbon release from groundworks; loss of carbon retention through habitat loss.
<b>Embodied carbon:</b> <ul style="list-style-type: none"> <li>- Report on embodied carbon in new projects</li> <li>- Set baseline and adopt a target for reducing embodied carbon on new projects during RIIO3</li> <li>- Reduce embodied carbon in the network</li> </ul>	Deliver construction projects at as low carbon intensity as possible, as set out in our Low Carbon Infrastructure Roadmap and invest in carbon compensation projects, that also deliver social and/or nature benefits from constructing our infrastructure <ul style="list-style-type: none"> <li>• 50% low-emission concrete by 2030</li> <li>• 50% low-emission steel by 2030</li> </ul>	<ol style="list-style-type: none"> <li>1. We have seen no report on embodied carbon in the N2T project, despite asking the question. We have seen no evidence about soil carbon released; carbon released during habitat destruction; carbon impact of concrete pylon bases; impact of steel construction &amp; transportation.</li> <li>2. Likewise, we have seen no baseline or target to reduce carbon impact in the N2T proposal.</li> </ol>



	<p>Carbon compensation projects for communities e.g nature-based solutions, energy efficiency and technologies and innovations instead of offsets.</p> <p>Fig 23 Highest impact/opportunity includes design risks: capital carbon from construction design; loss of natural capital/biodiversity. Design responses: reduction in capital carbon from construction design as much as it's feasibly possible and compensate; incorporate net gain and wider environmental benefits at a design stage so biodiversity is not lost.</p>	<ol style="list-style-type: none"> <li>3. There has been no carbon consideration or comparison with respect to alternatives to NGET's preferred N2T option. NGET's approach is to choose a solution and then to attempt to reduce its carbon impact by, for example, buying 'green concrete'. This is not acceptable. The evaluation must be carried out at an early stage to inform choice of technology and not just after a solution has been chosen. Projects must be compared for their impact.</li> <li>4. There is nothing in NGET's Roadmap about the mitigation hierarchy, which (as a key part of the BNG legislation) requires the avoidance of harm. NGET appears to misunderstand the principles of BNG.</li> <li>5. It is clear that NGET consider that offsets are acceptable instead of avoidance, yet NGET admits offset land may not be available and that 'innovative' approaches may have to be used instead. This is in breach of the precautionary principle.</li> <li>6. No implications of natural capital loss and ecosystem service impairment have been set out, in terms of how to avoid losses and restore when harm is done.</li> <li>7. We have seen nothing about time lags in offset maturation, financial implications of ecosystem service loss before offsets mature, and the lack of surety about offsets being capable of delivering sufficient biodiversity gain.</li> </ol>
<b>Biodiversity &amp; Natural Capital:</b>	By 2031, we will: • Disclose the Nature-related risks, and dependencies from	<p>NGET fails against all of Ofgem's criteria:</p> <ol style="list-style-type: none"> <li>1. Why as late as 2031? Why not immediately?</li> </ol>

<ul style="list-style-type: none"> <li>- Adopt an appropriate tool to assess net changes in biodiversity from different options for new connections and network projects</li> <li>- Set out what the materiality threshold should be for new connections and network projects</li> <li>- Regularly report on changes in natural capital and ecosystem services</li> <li>- Report on actions taken to assess and remedy the impacts of activities conducted within National Parks</li> </ul>	<p>our direct and indirect operations including our supply chain using the Nature Related Disclosures (TNFD) framework as a guide.</p> <p>The changes we are proposing to our Annexe 1 Environmental Action Plan<sup>23</sup> in RIIO-T3 will support the energy transition in a way that achieves sustainable operations and contributes to a nature positive future, whilst being respectful of planetary boundaries</p> <p>In 2022, the global community agreed via The Kunming-Montreal Global Biodiversity Framework, that by 2030, we will halt and start to reverse the loss of biodiversity and put nature on a path to recovery. The aim of our 'Nature Positive' commitments aims to support and enable the delivery of this global goal for nature. However, the four below are more qualitative in nature and more difficult to set specific metrics. But in everything we do we will aim to align and deliver. Goal A: Protect and restore</p>	<ol style="list-style-type: none"> <li>2. NGET has no biodiversity report<sup>24</sup> as required by the government's Biodiversity Duty. This was due by January 2024.</li> <li>3. There is not a single mention of Natural Capital in the RIIO T3 business plan. This is despite it being a requirement of Ofgem and also something highlighted in 2024 by the UN<sup>25</sup> and Natural England as crucial – and not to be overlooked in the drive to build renewables to mitigate climate change. While it is mentioned in the Environmental Action Plan, there is no qualitative assessment of what the impact of NGET projects are on natural capital, what the impact of different alternatives would be and what total loss of ecosystems services due to NGET projects will be.</li> <li>4. No tool has been adopted to assess net changes in biodiversity from different options for new projects.</li> <li>5. We have not found NGETs materiality thresholds for new projects.</li> <li>6. We have seen no reports on changes in natural capital and ecosystem services for new projects – although we have been asking for this evidence for N2T since 2022 during three consultations.</li> </ol>
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<sup>23</sup> <https://www.riiot3.nationalgrid.com/document/30008/download>

<sup>24</sup> [Complying with the biodiversity duty - GOV.UK](https://www.gov.uk/government/consultations/complying-with-the-biodiversity-duty)

<sup>25</sup> Natural capital was mentioned in T1 <https://www.nationalgrid.com/electricity-transmission/document/135501/download> Natural England's recent paper on Natural Capital risks: <https://publications.naturalengland.org.uk/publication/6683489974616064>; UN. Don't focus on climate action at expense of nature: [Media Release: IPBES Nexus Assessment | IPBES secretariat](#)

	<ul style="list-style-type: none"> <li>• Goal B: Prosper with nature</li> <li>• Goal C: Share benefits fairly</li> <li>• Goal D: Invest and collaborate</li> </ul> <p>Marine: For the RIIO-T3 period we will look at marine enhancement and restoration as a new priority</p>	<ol style="list-style-type: none"> <li>7. Worse, NGET has stated that it will disclose nature risks as late as 2031 not at the start of the RIIO-T3 period.</li> <li>8. Although (in 6.3.2.2. The nature crisis), NGET admits to nature and biodiversity crises there are no measurements of how its projects are worsening the crisis nor recommendations for how to minimise the impact. There is no recognition of project harms, let alone scientific or evidence led methods to identify harms.</li> <li>9. There has been no attempt to assess habitat / biodiversity loss from projects.</li> <li>10. Water: BP does not include any assessment of impact on water courses and aquifers from projects and how to avoid this. We supplied NGET with a paper on risks to water from soil disturbance in 2024 but have not had a response.</li> <li>11. Marine – no efforts have been made to appraise harm, avoid harm, integrate offshore</li> <li>12. It would be nice to see NGET embracing the ‘nature as a stakeholder’ approach but this has not been adopted<sup>26</sup></li> <li>13. NGET needs to be clearer about which planetary boundaries it refers to.</li> <li>14. We can see no mention of natural capital nor any attempt to measure it, no specificity around ecosystem services and which will be affected and how to avoid and mitigate these both in terms of service delivery and</li> </ol>
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<sup>26</sup> [How to embed Nature as a stakeholder in your business | ICAEW](#)

		ecosystem services value (monetary). We have seen no attempt to determine natural capital and ecosystem service impacts, qualitatively, quantitatively or monetarily from land use impacts.
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Getting the balance correct between clean energy and nature is critical and there are also legal obligations to consider.

In relation to its recent report “Progress in improving the natural environment in England 2023/2024, January 2025<sup>27</sup>”, the OEP states that the “Government is still largely off track to achieve obligations endorsed by Parliament to significantly improve the natural environment”.

Within the conclusions in the report it states:

“...The effectiveness of policy measures will be limited if they do not tackle the underlying causes of environmental degradation related to the societal systems that meet the needs for food, energy, mobility and the built environment; and improve coherence, harness synergies and deal with trade-offs.

Like climate change, nature recovery is a long-term and complex issue. Taking actions that maximise synergies in mitigating and adapting to climate change, alongside restoring nature should be seen as investing in a more prosperous, sustainable future.

The government has responded to the climate challenge with the ‘clean energy superpower’ mission. A mission for nature to drive action would clearly demonstrate that this is a government for Net Zero and for nature and that the two are inextricably linked. The government now has a unique opportunity with the EIP revision to take a more integrated approach and improve EIP delivery and its integration with climate and wider policies, to achieve a significant environmental improvement.”

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<sup>27</sup> <https://www.theoep.org.uk/report/government-has-chance-get-track-meet-legal-environmental-commitments-window-opportunity>

# Transparency and strategy

## Transparency and risks

It is stated in the business plan that accuracy and deliverability risks have been identified by the Board. However, it is difficult for stakeholders to comment meaningfully on the Business Plan due to the redactions throughout it.

Only this month, NGET has removed access to a video about the benefits of an offshore grid which contradicts its reasons for selecting overhead lines for the N2T project the very day we circulated it to our supporters. It had been available for ten months prior (but we were unaware).

Our campaign group has asked for detailed information about NGET's N2T project since 2022 but this has not been forthcoming.

The Investment Decisions Pack, Engineering Justification Papers and CBA are not available on NGET's RIIO T3 website. When we asked to be provided with these packs, we were told, that they will not be made available for scrutiny by stakeholders, which is highly unsatisfactory from a transparency perspective (notwithstanding the redaction statement):

*"The version of the National Grid Electricity Transmission Business Plan and supporting documents published on our website on 18 December 2024 reflect in as much detail as possible the documents that we submitted to Ofgem on 11 December 2024. By publishing these documents, we want to be as open and transparent as possible to help stimulate constructive engagement with our stakeholders on the content of our Business Plan and supporting documents. However, given the nature of our business it has been necessary to redact certain information and documents for commercial confidentiality and national security reasons.*

*For clarity rather than there being three single documents, there are multiple Investment Decision Packs, Engineering Justification Papers and Cost Benefit Analyses, which cover a wide range of topics. There are some Investment Decision Packs or Engineering Justification Papers which are confidential in their entirety (such as those relating to our cyber security plan). For the remaining documents we have produced summaries as an alternative to a heavily redacted document because we believe they provide stakeholders with a better understanding of the proposed investments and the key issues that we considered. These can be found under 'annexes and supporting information' on our website:*

*<https://www.riiot3.nationalgrid.com/supporting-documents>*

## East Anglian regional strategy

Our review of NGET's East Anglian report<sup>28</sup> that accompanies the business plan makes it clear that there is nothing in the East Anglian element of the business plan which tells us how the plan reflects stakeholder and community views, while our own evidence makes it very clear that NGET has no interest in local views. We do not believe that NGET has met Ofgem's requirement (4.30) to evaluate *"a wide range of potential options and strategies to determine the most effective and efficient engineering solution for a project."*

Nor has NGET achieved an "appropriate balance between competing interests" (4.31) such as economic (best value for existing and future consumers), environmental and social considerations, future-proofing timings and risks in East Anglia.

NGET notes "We have received feedback from >12,000 stakeholders as part of the listening phase of our price control engagement programme" – but it does not state upon what basis these people were engaged with or give any further detail. Given that 13,000 people are known to have responded to the N2T Statutory Consultation alone and that this feedback was overwhelmingly against NGET's overhead line proposal and in favour of HVDC undergrounding, an offshore grid and upgrading the existing grid, how much confidence do we have in the figure given here?

With the N2T project, NGET does not comply with Ofgem's key outputs:

Ofgem output	Our comment
Infrastructure fit for a low-cost transition to net zero;	We do not believe that overhead lines are fit for a low-cost transition to net zero. The project has not been adequately costed and is likely to cost 4-8 times more than stated by NGET. There has been no quantification of the carbon impact of the preferred option, nor of discarded or community preferred options. Overhead lines are at greater risk from extreme weather including high temperatures, storms and ice-loading. The construction process destroys habitats and the overhead lines kill birds, thus threatening the very natural capital which helps to regulate climate. P42 main RIIO3 report: "Balancing trade-offs with other areas of our plan" Where is it demonstrated that the trade-offs referenced will result in a net benefit? This includes deciding "not to follow accelerated removal of SF6 from our network as this would prevent us being able to expand the grid to help decarbonise the economy" (noting the high global warming potential of SF6) and the issues associated with sourcing low carbon materials. There is a subsequent statement "full control and visibility of trade-offs between decarbonising the grid at pace and reducing our environmental impact via a deviation process and sustainability governance"
Secure and resilient supplies;	Overhead lines are at greater risk from extreme weather and terrorism than an offshore grid or HVDC underground cables.
High quality of service from regulated firms;	As communities we have not experienced a high quality of service

<sup>28</sup> <https://www.riio3.nationalgrid.com/document/30121/download>

System efficiency and long-term value for money.	We cannot know if the proposal offers truly good long-term value for money because of NGET's lack of transparency around costings for N2T. We do know that very significant costings of the OHL option have not been included in the project cost and would result in a project costing 4-8 times the cost presented. We also know that the HVDC underground option N2T has not been costed. In addition, all independent reports since 2011 show that a coordinated offshore grid saves money versus the radial/piecemeal approach to a North Sea grid.
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NGET's ambitions as follows will not be met in RIOT3 and NGET is severely failing in **"Ambition A: Deliver the grid of tomorrow, today"**..:

NGET ambition	Our comment
A1: Maintain world class levels of network performance and resilience, ensuring that the new network we build is designed to reflect future security and climate challenges	The N2T overhead lines proposal does not prepare for future heat-waves, with the potential for temperatures +40 Degrees C. In heat-wave situations overhead lines risk causing field and woodland fires (there is much evidence in the USA of this). Nor do overhead lines give us resilience against very high winds (as approaching Scotland 23 January) or ice storms. The radial approach to connections offers less resilience (according to NESO 2020) than an integrated approach.
A2: Deliver the capacity our customers need now, looking holistically across multiple investment drivers to deliver at the pace and scale required to support the Government's ambition on growth and decarbonisation	By attempting to ignore stakeholders and force through an unpopular and outdated solution, NGET risks delaying the upgrade and causing legal delays. Instead, NGET should work with stakeholders for a solution that works for all, like the many that communities have proposed (upgrading the existing grid, HVDC undergrounding, offshore grid, use of Bradwell dis-used infrastructure, perhaps as an HVDC landing point and trenched cables following the line of the disused pylons to a converter station near to demand). Note that only a year ago, the previous government, in an evidence-based approach, was proposing to reconsider the presumption in favour of overhead lines.
A3: Future-proof our network with strategic capacity and flexibility for the longer term, using the network modelling capabilities we developed in RIIO-T2 to surface insights and inform strategic decisions	<p>This could be achieved more cheaply, be popular and create less environmental destruction. Our Leaders and Laggards report, footnoted earlier, sets out how.</p> <p>The "grid of tomorrow" is clearly HVDC and this is indeed being widely adopted "today" throughout the world, including by our European near neighbours. Priority for adoption of offshore and underground HVDC in the UK should be given to projects such as N2T where the proposed reinforcement is a 400kV AC OHL circuit running parallel to an existing 400kV AC OHL circuit, which is to be retained. The cumulative impact of two 400kV AC OHLs in the region, each spanning approximately 160km would be huge.</p> <p>NGET has clearly recognised the potential of HVDC and by developing ultra-high voltage DC grid technology it is confirming the technology route that needs to be pursued now. E.g. from RIIO-T3 Innovation Annex (Annex 09): <b>"Ultra-high voltage DC ultra grid plans:</b> ...Our proposed UHV DC spine could deliver up to 10GW per circuit over a much greater distance than the equivalent 400kV AC circuits..."</p>

	<p><b>“Ultra grid benefits:</b> Potential of up to 40% reduction in route length, resulting in less transmission lines. Billions of pounds in capital investment savings, which will reduce cost impact on consumers compared to traditional 400kV AC reinforcements...Reduced impact on communities and the environment due to fewer grid reinforcement projects...”</p>
A4: Invest in the next generation of innovative technologies to make sure that we are planning and building a network that is ready for tomorrow	<p>We have seen no evidence that technologies like TS Conductor (owned by NGET) or HVDC conversions of existing overhead lines have been considered for RIOT3, yet we know that TS Conductor is in the process of seeking regulatory approval and offers capacity upgrades of between 3 and 5 times, while also making new overhead lines cheaper, with fewer and lower towers. It is negligent to consumers, communities and nature not to consider this technology for N2T instead of adding extra infrastructure. Although we know from the full business plan that, in the very vaguest terms, some of the existing lines have been upgraded and that some advanced technologies such as dynamic line ratings are being employed, there is very no information on exactly how much capacity has been gained or for the potential to add capacity. It is Ofgem’s job as regulator to ensure that the existing grid is upgraded before new and expensive new grid infrastructure is built.</p>
Ambition B – do the right thing for consumers	<p>The lack of transparency about project costs (particularly the details of N2T costings) and the lack of full consideration of alternatives which are known to be cheaper elsewhere is risking higher bills for consumers than necessary. As noted earlier, a video which set out all the benefits of an offshore grid that we have been raising for three years was removed from National Grid’s website only a few hours after we circulated it.</p>

**The business plan gives us no information about who was asked or what they said, so we have no way of telling us if the regional business plan reflects what NGET heard:** “Local regional stakeholder input from bodies such as the Distribution Network Operators, local authorities, and community representatives gathered understandings on market dynamics and future expectations at a local level.” Nor do we know if directly impacted communities were asked about the business plan. We do know that we, as probably the largest campaign group in the region, with 38,000 supporters, were not engaged with.

NGET is knowingly placing itself at risk of project delay due to legal challenges. Our group already has four legal opinions about legal deficiencies in the process.



NGET's Load strategy report<sup>29</sup>

NGET says	Our comment
The broad objectives of the project development process include: determining the best overall outcome to meet the needs of consumers, customers and society at large	Why does NGET's 'best overall outcome' not include the environment and nature? In determining outcome, we know that in the case of N2T (N2T), by not following Treasury Green Book guidance, consumers, home-owners, communities and businesses are short-changed.
...fulfilling the appropriate balance of legislative and licence obligations, and broader societal expectations, in the development of the transmission network.	No Biodiversity Report has been published by NGET despite being required from January 2024
NGET says that it will follow a process outlined in Fig 15, Key stages of project development (the optioneering process, to refine scope). It includes: Stage 2, early development - Evaluate extensive options; conduct surveys & engage with stakeholders; refine deliverable options & select preferred Stage 3, Detailed development & sanction: cost the preferred scope; produce detailed diagrams & drawings	In the case of the N2T (N2T) proposal the key stages outlined in Figure 15 have not been adhered to. With N2T, the 'surveys and engagement with stakeholders' did not happen at the early development stage – they happened after the preferred scope was costed and decided on. Likewise, there was no refining of deliverable options based on engagement with stakeholders, because the preferred option was presented to stakeholders at the very outset, in April 2022, and has remained the preferred option through three consultations to date.

<sup>29</sup> <https://www.riiot3.nationalgrid.com/document/30014/download>

# Conclusions

In some instances, NGET has not complied with Ofgem requirements at all and in other cases what is set out in the business plan has not been reflected in reality in our dealings with NGET. Contrary to Ofgem's requirements, stakeholders are not at the heart of NGET's plans and investment in NGET's plans will come at the expense of the environment. Consumers are placed at risk by the lack of appraisal of alternatives, the lack of transparency in costings and the refusal to follow Treasury Green Book guidance.

## Stakeholders

- a. We do not believe that NGET has achieved an appropriate balance between competing interests. Impacted communities (particularly rural communities) and nature (which can be viewed as a stakeholder) are disproportionately affected and unheard. We know from our specific experience that alternative transmission options to those proposed by NGET can achieve a better balance and can provide better economic value, environmental benefits, future-proofing and less risk. Instead, we risk seeing much infrastructure that is not fit for a net zero future and not value for money.
- b. We have concerns about how the stakeholder groups were selected, what they were asked (and not asked) and what national research was taken into account. It seems that there is a strong bias away from rural stakeholders and communities directly impacted by transmission upgrades in NGET's research.
- c. Community acceptance has not been demonstrated in East Anglia, nor nationally. Our national survey by marketing insight professionals, Norstat, showed very strong support for the need to prioritise food security and nature, and to protect countryside, in the grid upgrade. The survey shows extremely strong public support for alternatives to pylons and for full compensation for affected parties. Moreover, it confirms our suspicion that the general public simply has no idea of the level of pylons construction destruction, thus opinions in other surveys may be skewed in favour of pylons. Finally, the vast majority do not want to live near a pylon. These issues are of great importance to the general public, across regions, genders and age groups but have not been addressed in NGET's business plan.

## Environment

- d. NGET must revisit its Environmental Action Plan to include an evaluation of the natural capital, carbon and biodiversity impacts of projects and their alternatives. This analysis should comply with the Treasury Green Book guidance and must include do-nothing; upgrade existing grid using grid enhancing technologies; underground HVDC and coordination offshore (instead of piecemeal/radial approach)
- e. NGET must demonstrate how it takes the Mitigation Hierarchy into account.
- f. NGET must publish a biodiversity report in line with the government's biodiversity duty.
- g. Reports must be transparent and available for public scrutiny.

## Transparency and Optioneering.

- h. We believe that NGET must conduct a full and transparent economic evaluation, of options to include socio-economic impacts, natural capital and biodiversity impacts and carbon impacts of projects and alternatives, adhering to the Treasury Green Book.
- i. Stakeholders, including communities, must be part of the optioneering process to ensure fairer, faster decision-making.
- j. Ensure innovation by applying global best practices to modernise the UK grid while minimising ecological and social disruption.
- k. The business plan must be revisited to ensure that the Equality Act 2010 has been taken into account.

## Next steps

We seek to understand how our concerns (many of which we have raised several times previously, but are as yet unaddressed by Ofgem), will now be addressed.

We note that this consultation helps to inform the next stages and that Ofgem's assessment during 2025 includes ongoing stakeholder engagement, such as 'a formal 8-week consultation (Draft Determinations) by summer 2025, working groups on key policy areas and detailed work with network companies and their Independent Stakeholder Groups (ISGs)'. **We wish to be considered for inclusion in any stakeholder engagement.** We are active across three counties, representing 38,000 people who have signed our petition, and we liaise with other community groups across the UK.

In the light of the above, **it is imperative that Ofgem asks National Grid's Independent Stakeholder Group (ISG) to review the areas of the business plan we highlight concerns about.** (This option is set out in paragraph 2.5 of Ofgem's Business Plan guidance when there is a 'particular need or significant consumer or stakeholder interest'. In this case, all three apply.) We would like to meet with the ISG.

We will be asking the Office for Environmental Protection and National Audit Office to read this submission.

# Appendix A

## Mitigation hierarchy

The mitigation hierarchy is a fundamental principle in environmental planning and biodiversity conservation, guiding the management of potential impacts from development projects. It is not mentioned once in NGET's RIIOT3 Business Plan

It involves a sequential approach:

1. **Avoid:** Efforts should first be made to avoid adverse effects on site integrity altogether.
2. **Minimise:** If avoidance isn't possible, steps should be taken to minimize impacts.
3. **Remediate/Restore:** Where impacts occur, habitats should be restored or remediated to their original state.
4. **Compensate:** As a last resort, compensate for any residual harm through habitat creation or restoration.

It is referred to in

- DEFRA's Biodiversity Net Gain consultation: [https://consult.defra.gov.uk/land-use/net-gain/user\\_uploads/05.-measuring-biodiversity.pdf](https://consult.defra.gov.uk/land-use/net-gain/user_uploads/05.-measuring-biodiversity.pdf)
- Biodiversity Net Gain guidance: <https://www.gov.uk/guidance/understanding-biodiversity-net-gain>
- The National Planning Policy Framework, which reminds us of the importance of avoiding harm in paragraph 193: When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused [National Planning Policy Framework](#)
- The Environmental Outcome Reports consultation

# Appendix B

Email from our group to John Pettigrew, 7/10/24

Dear John

In your recent interview with The Times you said, " "I'm not going to say we have a nimby problem. We have people who are passionate about their local communities **and would rather the infrastructure go somewhere else,**" "

This is a very unfair and incorrect characterisation.

**Our campaign, as you know very well, is arguing that there are better, cheaper alternatives that are also more popular:**

- HVDC undergrounding
- Integration offshore, and
- upgrading of the existing grid before building damaging, costly, new transmission infrastructure.

We are also tired of hearing National Grid representatives stating in the media that undergrounding is much more expensive. (The multiples given by your spokespeople vary hugely.)

Please could you confirm to us how and when your spokespeople will receive training about the benefits of HVDC undergrounding?

Those benefits are highlighted in the ESO East Anglia Study this year and in National Grid's own evidence base for Eastern Green Link 3/4. In addition, we would be very grateful if you could ensure that your spokespeople understand the difference between an integrated offshore grid, which we seek, and a bootstrap between Norwich and Tilbury, which covers a large distance on land.

Thank you in advance

# Appendix C

Letter from NGET to other parties inviting participation in a consultation on Stakeholder, Community and Amenity Policy. This should be a public consultation for all interested, not a selective process.

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**From:** Tom O'Connor <[Thomas.O'Connor@nationalgrid.com](mailto:Thomas.O'Connor@nationalgrid.com)>  
**Sent:** 17 January 2025 10:44  
**Subject:** National Grid Electricity Transmission and National Grid Ventures - consultation on Stakeholder, Community and Amenity Policy (due by 14th February)

Dear Stakeholder,

National Grid Electricity Transmission (NGET) and National Grid Ventures (NGV) are consulting on a revision to our Stakeholder, Community and Amenity Policy (SCA Policy). For this, we are consulting with bodies we regularly engage with to develop the consenting and delivery of our projects.

Under section 38 and Schedule 9 of the Electricity Act 1989, we must meet our obligations to the preservation of amenity and regularly review how we manage those duties, including our consultation process. To accord with this, we provide a Schedule 9 Statement (which we name our Stakeholder, Community and Amenity Policy). Our previous SCA policy dates from 2016 and therefore is well overdue an update. The revised SCA Policy is underpinned by ten commitments. The draft 2025 version we are consulting on provides key updates, namely:

- A joint Schedule 9 statement between Electricity Transmission (ET) and National Grid Ventures (NGV) **to reflect policy and legislative changes since the previous 2016 version.**
- More references to reflect our **increasing portfolio of projects in the offshore environment** such as interconnectors and subsea cables.
- Updated text on **effective and meaningful consultation** – e.g. utilising digital tools to improve engagement.
- New sections on **Biodiversity Net Gain (BNG)** and **'furthering the purpose' of Areas of Outstanding Natural Beauty** in line with new legal requirements.
- Reinforcing our approach to apply **the Mitigation Hierarchy**, to avoid significant harm to the environment, and where this cannot be avoided, to consider mitigation and possible compensation measures, in line with wider national policy updates.

The revised SCA policy is currently in draft form as attached. Please therefore do not forward this beyond your organisation.

We would welcome your feedback by **Friday 14<sup>th</sup> February** (4 weeks from today). We would encourage feedback to either be provided as comments on the draft PDF document or written in an email or summary note.

If you are not the correct person in your organisation for this, please could you kindly forward this to the relevant colleague and copy me in.

If you have any queries, do feel free to get in touch.

Many thanks  
Tom

**Thomas O'Connor MRTPI**

# Appendix D

## Global suppliers of HVDC ramp up production

Several key industry players are actively expanding their production capacities:

- **Nexans:** The company has completed a 34,000-square-meter expansion of its subsea cable facility in Halden, Norway, more than doubling its capacity for HVDC extruded cables. This expansion includes a 152.89-meter-tall extrusion tower, allowing the plant to insulate four cables simultaneously, enhancing its ability to meet global demand.
- **Prysmian Group:** Prysmian has announced plans to invest €1.8 billion in capacity expansion to meet rising cable demand. Notably, the expansion at their Pikkala site in Finland is set to more than double the plant's existing production capacity of 525 kV extruded submarine cables and 400 kV AC cables by 2026. *(Supplies NGET)*
- **NKT Cables:** expanding - **Asnaes, Denmark** NKT is expanding its factory in Asnaes to increase production of medium-voltage power cables. The expansion includes a new factory hall and test facilities. And **Karlskrona, Sweden** NKT is building a new high-voltage factory and adding a second cable extrusion tower. The tower will be 200 meters tall and will add insulation to the high-voltage power cables. *(Supplies NGET)*
- **Sumitomo Electric:** The company has acquired a majority shareholding in Südkabel, a German high-voltage cable manufacturer, and is expanding its production capacity in Mannheim, Germany. This strategic move aims to locally manufacture 525 kV HVDC cables to support Germany's net-zero initiatives. And: On Wednesday 22 January, Scottish & Southern Electricity Networks (SSEN) Transmission announced that it has entered into a Capacity Reservation Agreement (CRA) with Sumitomo Electric Industries Ltd. for the supply and installation of a second 525kV high voltage direct current (HVDC) cable link between Shetland and the Scottish mainland. It states that the CRA will allow cable manufacturing for the project to be delivered from Sumitomo's new manufacturing facility to the northeast of Scotland.
- **Borealis and Borouge:** These companies are expanding their HVDC production capacity to meet the needs of the energy transition, with upgrades to their semicon compounding assets in Antwerp nearing completion. This expansion is critical to meet strong demand for advanced semicon compounds for HVDC applications, particularly for global offshore wind and interconnector projects.
- **Xlinks XLCC** is developing the UK's first HVDC cable factory, located in Ayrshire, Scotland, which will deliver 3,800-kilometer-long cables for the Morocco-UK Power Project.