

Ms Alice Delahunty  
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National Grid  
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**BY EMAIL**

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Projects Manager

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Date: 28/01/2025

Dear Ms Delahunty,

### **NGET RIIO T3 Business Plan 2026**

Suffolk County Council would like to take this opportunity to provide comments on the RIIO-T3 business plan, to bring to your attention issues that are considered critical to the wellbeing of our communities, and environment, in the face of the transformational change brought about by new energy infrastructure.

Suffolk is hosting multiple National Grid Electricity Transmission projects, (and projects promoted by other parts of the National Grid Group), as well as multiple nationally significant, and locally consented energy projects. The cumulative impact of these consented and emerging proposals is widespread and profound for the communities, environment, and economy of Suffolk. Furthermore, taken together, they create the risk of adverse impacts on individual and community well-being, especially in relation to both their consenting and construction<sup>1</sup>. Therefore, the Council is pleased to note that of the four delivery constraints identified by National Grid in the business plan, the fourth is community acceptance.

However, it is very disappointing that National Grid's RIIO-T3 business plan is unable to provide a robust scheme of community benefits, or a scheme of compensation, and critically does not set out a commitment to publish and publicise, a discretionary purchase scheme<sup>2</sup>, to support the small number of homeowners who have a pressing need to sell during the consenting or construction process, but, are unable to do so at the market value, because of planning blight.

The Council considers that this last omission is particularly disappointing, and made more so, given that the business plan sets out the need for anticipatory purchase of

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<sup>1</sup> <https://www.suffolk.gov.uk/council-and-democracy/council-news/energy-projects-and-the-wellbeing-of-communities>

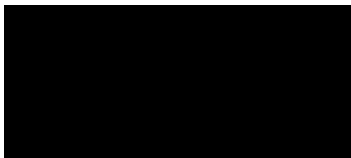
<sup>2</sup> <https://nationalhighways.co.uk/media/h2lbk0sw/your-property-and-discretionary-purchase.pdf>

land for new infrastructure, to ensure a low-cost energy transition for the consumer. It appears therefore, that the business plan does not give an equal weight to both a low-cost transition for the most vulnerable, and a just transition for the most vulnerable.

In relation to environmental issues, the Council notes, and welcomes, the continued operation of the scheme of Visual Impact Provision and of the Landscape Enhancement Initiative, for Nationally Designated Landscapes. The Council considers this is particularly important given the strengthened and revised duties<sup>3</sup> in relation to National Parks and Areas of Outstanding Natural Beauty. However, given the modifications to National Policy Statement EN-5<sup>4</sup> paragraph 2.11.6, in relation to significant landscapes outside National Parks and AONB's, where supporting evidence exists to pass the relevant policy tests; the Council considers that both visual impact provision, and, if undergrounding cannot be achieved, the Landscape Enhancement Initiative, should, in principle, be applied.

The County Council recognises that the government's failure to progress substantively either community benefits or compensation, has left National Grid in a difficult position<sup>5</sup>, as set out in the High-Level Summary on Community Benefits. In light of this, the government's target to decarbonise the electricity system by 2030 remains not only unrealistic but, moreover, the government is seeking to achieve this target without making a substantive offer to communities to secure the necessary social consent or deliver a demonstrably just transition. This is particularly short-sighted, given that National Grid have identified societal acceptance as one of the four key constraints to electricity infrastructure delivery.

Therefore, the proposed *Use it or Lose it Allowance* arrangement for community benefits is a welcome, and necessary, interim measure in the absence of progress by the government. However, the Council does consider that there is an opportunity for National Grid to rapidly resolve the issue of a published and publicised discretionary purchase scheme, and that the relationship between VIP/LEI and EN-5 could be resolved in collaboration with Ofgem.



Richard Rout

Deputy Cabinet Member Nationally  
Significant Infrastructure Projects

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<sup>3</sup> <https://www.gov.uk/government/publications/the-protected-landscapes-duty/guidance-for-relevant-authorities-on-seeking-to-further-the-purposes-of-protected-landscapes>

<sup>4</sup> <https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5>

<sup>5</sup> <https://www.riiot3.nationalgrid.com/document/30031/download>