



National Grid's proposed approach to undergrounding new electricity transmission lines

Response by the English National Park Authorities Association

The English National Park Authorities Association (ENPAA) exists to support policy making through coordinating the views of the ten English National Park Authorities. It is governed by the Chairs of the ten Authorities. This response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs). National Parks cover approximately 9.3% of England by land area, and are designated in part for their natural beauty. National Park designation affords the highest level of statutory landscape designation. A map showing the location of protected landscapes in the UK is attached at Annex 1.

We welcome the opportunity to comment on National Grid's proposed approach to undergrounding new electricity transmission lines. We do however have some concerns around the consultation material that has been presented, and the proposed process set out in the consultation document. **We would like to see National Grid's approach set out a clear commitment when planning new transmission lines to avoid protected landscapes (including National Parks) and their settings wherever possible in accordance with the Holford Rules¹**, which refer to "major areas of highest amenity value".

Where this is not possible, there should be a presumption of undergrounding new transmission lines unless there are specific limitations relating to geology, archaeology or ecology that make this undesirable. National Parks contain a richness of archaeology and priority wildlife habitats, as well as major carbon stores, and undergrounding in sensitive areas such as peatlands may be unacceptable due to potential damage to the resource. However many ecological and archaeological constraints can be mitigated against, and undergrounding projects can facilitate investigations that reveal more information about an area.

Only where the National Park area cannot be avoided, and there are specific considerations that preclude undergrounding, should the option of overhead transmission lines in National Parks be considered. The visual impact of overhead lines can never be mitigated against and results in permanent loss of visual amenity and degradation of the valued visual characteristics of the landscape. ENPAA welcomes the statements relating to landscape impacts in National Parks and other "exceptionally constrained areas" in National Grid's more detailed policy on underground connections, which appear to reflect the spirit of the Holford Rules. The proposed approach to undergrounding offers an opportunity to further clarify National Grid's position on this topic.

ENPAA endorses the development of low carbon energy generation, and indeed National Park Authorities have provided grants to many renewable energy projects particularly

¹ <http://www.nationalgrid.com/NR/rdonlyres/4F95E702-A659-4D2A-A02F-738DE6A03B9C/41421/HolfordRules4.pdf>

through the Sustainable Development Fund (SDF). We recognise the need for changes in the transmission system to facilitate the connection of new energy generation systems. We would hope to see extensions of the transmission system driven by genuine existing and future need for generation, rather than perceived demand.

Other comments and suggestions for improvements to the proposed approach are set out below according to the section headings given in the consultation document.

Background

We have concerns around the background information that is presented in the consultation document. It gives a somewhat selective picture of the relative merits and disadvantages of underground versus overhead transmission options. For example, the opening paragraph states that “Burying high voltage electricity lines can have landscape and visual benefits”. There is no mention of the economic and social benefits associated with maintaining a high quality landscape, for example the positive effects for rural tourism and recreational opportunities. Conversely the negative impacts of new overhead transmission lines are mentioned only in relation to restricting the height of trees and buildings. The fact that overhead lines have a significant visual impact is implicit in the document and the nature of these impacts should be made more explicit, but there are other considerations including limitations for some recreational activities such as kite flying, hang gliding and angling. These could be significant given the high level of recreational use of protected landscapes and the value of tourism and recreation to the economy of our most valued landscape areas.

The ‘Background’ section goes on to highlight the specific advantages that overhead lines offer to National Grid. This does not address the potential advantages that underground cables may have in terms of greater reliability. As highlighted by Campaign for National Parks, Campaign to Protect Rural England and National Association of AONBs in their response to the IET/KEMA call for evidence (December 2010), international experience on the economics of delivering underground cabling should be taken into account when statements on costs and benefits are made. It is important that these are based on findings from research and technical development that represent the most up to date information available.

Our duties and obligations

All relevant authorities have a duty to have regard to National Park purposes under Section 62 of the *Environment Act (1995)*. We believe that in discharging its environmental duties National Grid should demonstrate a desire to act in the collective national interest regarding designated landscapes and the environment more generally. Undergrounding new transmission infrastructure is an important way in which National Grid can discharge its environmental duties, notwithstanding the potential natural and cultural heritage constraints referenced above.

Planning Policy Statement 7 sets out clearly the tests that must be applied before any major development is permitted in protected landscapes (Key Principles, paragraph 22). National Grid should also ensure that due regard is given to the European Landscape Convention which highlights the important role of stakeholders (such as National Grid) in developing landscape policies and procedures that support the protection, management and planning of landscapes. We hope that the duty under Section 40 of the Natural Environment and Rural Conservation Act 2006 which requires all public bodies to have regard to biodiversity conservation when carrying out their functions will also be a key consideration given the important public nature of National Grid’s activities.

Our process

Where the need for a new transmission line that may pass through or near a National Park is identified, the affected National Park Authority should be consulted at the earliest possible opportunity. The Association of National Park Authorities and National Association for Areas of Outstanding Natural Beauty have a joint accord with mobile phone network operators that recognises this principle with regard to mobile telecommunications infrastructure. It would be helpful to see a clear commitment to give special consideration to protected landscapes at the outset of the process.

It should also be recognised that the setting of protected landscapes is an important consideration. The landscape setting for a National Park is the area whose landscape character compliments that of the National Park itself, either through similarity or contrast, and in some way supports or enhances its landscape through views into or out of the National Park. The setting is also defined by the intervisibility of the landscapes on either side of the park boundary. Several National Park Authorities are undertaking work to define the key views into or out of National Parks, to help inform development decisions. We would be interested to know whether any GIS visual analysis at a national level is planned as part of the project to extend high voltage transmission. This could prove useful in identifying areas of potential sensitivity.

We suggest that the ordering of the process could be improved by moving the current step 4 (involvement of the specialist team) to come after step 1. It would seem to make sense to seek expert advice before going out to wider consultation, in order to ensure that the options for wider consultation are well informed.

Step 5 makes welcome reference to identifying opportunities to take down other overhead lines in the locality. We would support this idea, but would not want to see mitigation of this type used to justify schemes that would still cause unacceptable landscape impacts in themselves.

ENPAA welcomes the reference to full environmental impact assessment in step 7. We would suggest the removal of the wording “and cannot be mitigated by other means” from the first sentence, as this would recognise that full environmental impact assessment would be appropriate in all cases where landscape and visual impacts are significant and consideration is being given to undergrounding sections of the proposed transmission line.

In paragraph 9, which lists those whose analysis and opinions will be taken into account, there is currently no reference to National Park Authorities. We would like to see the reference to “the policies and advice of local authorities” amended to read “the policies and advice of local planning authorities”, as this would include National Park Authorities.

ENPAA
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Annex 1 – Map showing location of UK protected landscapes

