

National Grid Visual Impact Provision Consultation – National Parks England response

1 Do you have any overall comments on the draft policy?

- 1.1 We support the draft policy, and welcome its positive tone and emphasis on achieving the best outcomes in visual amenity terms from the funding available.

2 Do you support the broad approach to using the Visual Impact Provision?

- 2.1 Yes.

3 Why do you support/not support the broad approach to using the Visual Impact Provision?

- 3.1 The approach as set out allows for appropriate stakeholder engagement and consultation at national and local levels, while giving a clear steer on the principles that will be applied during the process. The proposal to use the money for mitigation projects above and beyond undergrounding (i.e. screening, relocating) is particularly welcome.
- 3.2 We welcome the statement on page 4, principle 1, that a qualified landscape architect will be appointed to compare and evaluate impacts of landscape character and visual amenity. It will be important that this person liaises closely with National Park Authorities and Area of Outstanding Natural Beauty (AONB) Partnerships, as they will hold detailed information about landscape character and visual amenity in the protected landscapes in question. We would not wish to see a duplication of work on landscape character; and there may be additional relevant information that the local National Park Authority or AONB can provide, including a completed Landscape Character Assessment for their area

4 What concerns, if any, do you have about the draft policy?

The English National Parks have a number of general and detailed concerns about the draft policy.

- 4.1 4.1 As part of its ongoing maintenance/renewal/repairs work, National Grid will have scheduled works already in the period covering 2013-2021. It is presumed that these planned works, which have not been subject to any rigorous prioritising assessment under the VIP scheme will be delivered outside of the budget for the VIP scheme. Only schemes which have been recommended by the Stakeholder Group and been through the same selection/prioritising and assessment procedure should be delivered using the VIP fund. It is not clear whether the £500m is an initial amount to be reviewed during the period to 2021 or a predetermined maximum, together with the relationship of the VIP to inflation.
- 4.2 It is not clear how priority schemes are to be identified initially, whether it is by NG and/or will potential schemes be brought forward by stakeholders ?
- 4.3 It is not clear if the £500m available is to be shared between Scotland, England and Wales, or whether this sum is for England and Wales alone with Scotland (through Scottish Power and SSE) having their own funding?
- 4.4 What thought has been given to the implications, if any, of the upcoming Scottish devolution vote on the scheme?
- 4.5 The selection criteria used to score and compare landscapes impacts (options appraisal matrix - OAM) of the power lines must be robust and competent (fit for purpose) and should include an assessment of adverse impacts on the perceptual characteristics of a National Park or AONB, however the baseline information may not be available in relation to this in all cases,

making comparisons more difficult or necessitating more time and resources to gather the information.

- 4.6 The appointment of the Landscape Architect, the brief, methodology and development of the OAM are critical elements of the process and should be made available for comment; their importance cannot be overstated.
- 4.7 If not already done, it is suggested that the advice of the Landscape Institute should be sought in developing this process.

5 Are there any modifications to the draft policy and the associated processes that you would like us to make?

- 5.1 On page 02 the last bullet point addresses infrastructure owned or operated by different businesses and statutory undertakers. It would be helpful to mention briefly here that although the Visual Impact Provision does not apply to DNO infrastructure, nonetheless the presence of DNO undergrounding schemes in an area may be a factor taken into consideration in decision making (as noted on page 10).
- 5.2 Sect 03 –The Guiding Principles could all be written positively to reflect positive outcomes of the VIP work.
- 5.3 Sect 04 – Suggested other organisations to be considered for the Stakeholder Group include a representative from the Landscape Institute , a planning Advisor, the Forestry Commission and somebody representing landowners, perhaps the CLA or NFU.
- 5.4 We welcome the understanding in FAQs that in appropriate circumstances “the Visual Impact Provision can where justified apply to lines adjacent to protected landscapes”. We request, however, that a) this statement is included in the policy document and b) National Grid’s “understanding” is clarified so that its ability to use VIP in such a case is stated with certainty, and c) that the distance or purely visual constraints implied in this proposal is clarified’.
- 5.5 We request inclusion of additional criteria / matters in the guiding principles such that: All National Park purposes should be taken into account so as to a) prevent unacceptable impacts (on a par with social-economic concerns) and b) take them into account when recommending priorities on the basis of benefits to particular landscapes.

6 What questions, if any, do you have about the draft policy and the broader initiative? Is anything unclear?

- 6.1 It would be helpful if the policy could provide further information on what will happen if the full allowance is not spent within the RIIO-T1 period. At present this is not clear, but it may become important if the process identifies large schemes that could be started but not completed within the period.
- 6.2 In Sect 03, do all the guiding principles carry equal weight?
- 6.3 How will these weightings (equal or otherwise) be reflected within the options appraisal matrix?

7 Is there any information you think we ought to publish alongside the final policy that would assist with the use of the Visual Impact Provision?

- 7.1 The documents listed on page 11 will be helpful. Clear information on the lines that might be eligible for use of the allowance is important, as is the locations of substations and other

associated infrastructure given that the funding could be used to provide screening to these structures

- 7.2 Are there any 'non-starters', for instance where undergrounding can't actually happen because of technical or engineering constraints? Can this information be made available to save time when considering schemes at a local level?
- 7.3 If the NPs/AONBs are going to be asked to bring forward schemes, has any constraints mapping been carried out and can this be published to save time when considering potential schemes at a local level?
- 7.4 Depending on what role the protected area organisations are asked to play in the process, what thought has been given to the ability of each protected landscape to release officer time to be able to carry out any of the works needed to identify potential schemes, and can this role be funded through the scheme?

8 Are there particular ways you would like us to engage with you?

- 8.1 We are pleased to have been invited to sit on the Stakeholder Advisory Board and we feel that this will enable close ongoing engagement with the process. If any email updates are planned in addition to the meetings of this Board, this would assist us in keeping all National Park Authorities up to date as we can circulate email updates to relevant staff.

National Parks England supports the policy making process by co-ordinating the views of the ten English National Park Authorities. This response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs) and follows internal consultation amongst the Parks.

NPE

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