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Date

Our ref

Your ref

17 September 2012

Dear Sir or Madam

## **RIIO-T1: Initial Proposals for National Grid Electricity Transmission and National Grid Gas Response to Q 2 by Broads Authority**

**Question 2: Do you have any views on our Initial Proposal on setting an expenditure cap for the start of RIIO-T1 in relation to addressing the visual amenity impacts of existing infrastructure in designated areas?**

1. The Broads Authority welcomes the new initiative to provide an allowance to transmission operators to underground existing transmission lines which impact on designated landscapes. This will compliment the existing initiative that is currently being delivered by the distribution networks.
2. We also understand that there will be a similar scheme for proposed lines which is also welcomed.
3. It will be important to ensure that the wording in the final document relates to addressing the visual amenity impacts of existing infrastructure on, as opposed to in, designated areas as the impacts generated by pylons do not just stop at administrative boundaries.
4. It appears that there is a willingness to pay by the public, but there is lack of clarity about how the ultimate allowance has been determined which is confusing to the stakeholders involved.
5. It will be essential that the allowance has the flexibility to be increased as the proposed levels would not achieve a great many schemes. How will this ceiling be reviewed and it's expenditure monitored?
6. We have concerns about "the use it or loose it philosophy". We understand the need for setting timescales for delivery , however given the Broads Authority's experience in

delivering projects to underground distribution lines, we have found they sometimes require protracted negotiations with landowners. One would assume that similar negotiations for transmission lines would be a lot more complicated and therefore time consuming. The concern would be if projects failed to be delivered within a price review period and the allowance lost.

7. A draft list of proposed schemes has already been published by National Grid – it would be beneficial if there is a greater level of transparency in the selection of schemes. There needs to have in-built a greater level of consultation with the relevant designated landscapes bodies as local knowledge may help the prioritisation process. It will also ensure that those lines targeted will deliver the greatest landscape benefits as opposed to being the most expedient to do.
8. As stated in no 1, this allowance will compliment the existing allowance used by the distribution networks. Within the Broads area there are no transmission lines that would appear to be eligible from this new allowance. However, there are three locations within the Broads where High voltage cables are carried on large pylons which have a significant impact on the visual amenity of the Broads landscape. As these lines would appear to be under the operational management of the network operators, in theory it would mean that they would be eligible for funding from the existing OFGEM allowance but the cost of this work would be prohibitive given the allowances available under this scheme. Is there any mechanism by which this new scheme being consulted on could provide funding for this type of line? If not further consideration needs to be given by OFGEM to how this anomalous situation can be addressed.

Yours sincerely



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Examples of pylons not eligible for current allowance.



