

Received by email
Dear Grant

Consultation reference 104/12: RIIO-T1: Initial Proposals for National Grid Electricity Transmission and National Grid Gas

Thank you for the opportunity to comment on the proposals within the document above and for giving us a short extension to the closing date of the consultation. The Countryside Council for Wales champions the environment and landscapes of Wales and its coastal waters as sources of natural and cultural riches, as a foundation for economic and social activity, and as a place for leisure and learning opportunities. We aim to make the environment a valued part of everyone's life in Wales.

We have not provided comments on all the questions asked. Our particular interest in this consultation is in the funding and process for mitigation of new and existing transmission infrastructure in AONB and National Parks.

Question 1: Do you have any comments on our initial proposals on NGET's output and incentives?

We offer the following points –

- It is unclear what is meant by 'efficiently' meeting the planning requirements for new infrastructure.
- We suggest that the use of other high quality landscape designations should not be dismissed nor should areas close to but not in National Parks or AONBs. Other areas could be included such as those with a national distribution and which have been quality assessed using nationally agreed criteria. In Wales, these include World Heritage Sites, Registered landscapes of Special and Outstanding Historic Interest and Registered Parks and Gardens.
- Individual protected landscapes do not give a complete national picture of landscape qualities for prioritising limited funding for mitigation. The Welsh LANDMAP landscape character assessment, which again is quality assured by panel of a national experts and which has scored some areas of landscape highly according to a rigorous set of criteria and could be used to provide additional criteria in Wales. We can provide more information on this if required.
- It is unclear to us where the 10% figure for under grounding of new lines has been derived from. What role, if any, has willingness to pay played in this? We need further clarification on what is meant by a 'volume driver' and the likely effect this will have the availability of funding for under grounding new transmission infrastructure. A baseline allowance equivalent to costs of under grounding 10% of new transmission assets seems low based on our recent experience of projects under consideration and the extent of under grounding that is likely to be needed to gain consent. For example, for the proposed mid Wales transmission system preferred route, NGET studies show that the proportion of the proposed route where under grounding is preferable is in the order of 40-50%.
- We agree with the principle of the approach of addressing visual amenity issues in the planning process rather than any fixed funding rule set through the price control and note this is consistent with the NPS. However we feel that there is a role for willingness to pay (WTP) in new lines in setting the framework for 'efficiently' meeting the planning requirements.
- It is our view that the policy for delivering visual amenity outputs in designated areas must be developed in an open and transparent way and feel it is important that a long term view is taken rather than the price plan periods. We suggest that the good landscape

assessment work already being developed by NG in sensitivity studies for new grid connections and the cross referencing to heritage and other impact studies, should be factored into the guiding principles for this work.

- It is unclear to us how the different TO policies would be coordinated and how any cross border existing transmission infrastructure would be approached.
- It is unclear how costs of using different pylon designs in new assets (which are presumably more expensive than the traditional structures) fit into this process and whether they would need to be funded from the baseline allowance.

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?

We offer the following points –

- We welcome the allowance proposed. However, to have real and lasting effect on the visual impact of our protected landscapes and highest quality landscapes, the sum currently proposed is unlikely to be sufficient and note in particular it is less than 10% of that proposed by NG following the willingness to pay research which CCW have participated in.

We look forward to continuing to work with National grid and Ofgem in developing an approach which would facilitate the prioritisation of areas and lines where most benefit can be gained from visual impact mitigation measures.

Regards
Sarah Wood

Dr S V Wood
Cyngor ar ynni ac isadeiledd pwysig / Energy and major infrastructure advice
Arweinydd y Tîm Cynllunio Gofodol, Ynni a Seilwaith Daearol
Team Leader, Terrestrial Spatial Planning, Energy and Infrastructure
Cyngor Cefn Gwlad Cymru / Countryside Council for Wales
Maes y Ffynnon, Ffordd Penrhos. BANGOR, Gwynedd. LL57 2DW.
Tel / ffôn: 01248 387282 / 01248 385500 / 07766596977
E-bost / E-mail: s.wood@ccw.gov.uk