

Received by email

English Heritage is an Executive Non-Departmental Public Body sponsored by the Department for Culture, Media and Sport, with its funding agreement signed by the Department for Communities and Local Government, and the Department for Environment, Food and Rural Affairs. It was established by the National Heritage Act 1983 and seeks to broaden public access to England's cultural heritage, increase people's understanding and appreciation of the past, and conserve and enhance the historic environment.

The majority of our response to this consultation relates to Chapter 2 Question 1 and, in particular, the proposals for existing infra-structure in designated areas.

**Question 1:** Do you have any comments on the overall package of proposals for NGET?

Within the consultation designated areas are defined as AONBs, National Parks and National Scenic Areas, however Heritage Coasts and World Heritage Sites are also included within the Holford Rules and we would be interested to hear why these have been omitted?

The results of the consumer research on this topic were presented at the National Grid Talking Networks Willingness to Pay Stakeholder Workshop on August 08. However, during the discussion it was not clear how well-informed the survey respondents were to the respective impacts of the mitigation options. For example, the scale of works associated with undergrounding together with their associated landscape changes are often not appreciated and undergrounding still requires above ground structures. Current practice in terms of landscape mitigation impacts is often limited and additional opportunities for landscape reinstatement are worth exploring further.

In some sensitive areas undergrounding may improve the appearance of historic landscapes, individual heritage assets and their setting, but a balance needs to be struck between these benefits and the potentially harmful impacts on buried archaeological remains and the landscape effected by the route corridor. We would therefore suggest that any selection process should take full account of all potential impacts together with an agreed strategy for minimising these impacts. For example, this could include modifying the route, adjusting the width of the scheme corridor and/or landscape reinstatement measures. Screening can also have both positive and negative impacts on the historic environment and wider landscape character which should be taken into account.

At present it is not clear how the routes are to be selected and whether it will be done on a first-come first-served basis or through some form of strategic prioritisation. The initial draft list submitted by National Grid appears to have been determined largely on the basis of operational requirements. To help inform this process it would be helpful to understand the impact of existing lines in AONBs and National Parks on the significance of heritage assets, particularly in terms of setting and/or historic landscape character. As a parallel exercise it would also be useful to determine the sensitivity of existing corridors in terms of their archaeology/landscape. If adopted such an approach would probably need to be staged with increasing levels of detail to enable all factors to be taken into account and balancing any visual benefits with other possible impacts.

Such approach would require consistency across the heritage sector and could usefully be expanded to include broader landscape and other environmental issues. The creation by National Grid of an environmental group including all the statutory agencies could perhaps be the best body to take this forward in terms of establishing guiding principles for the prioritisation of lines and areas culminating in an agreed process for selection. Of course, many of the points raised above also apply to both new electricity and gas routes and we note that for the former there is a 10% allowance in the consultation for the undergrounding of new lines for visual amenity.

At a strategic level English Heritage is prepared to work with National Grid and other environmental bodies in developing the ideas set out in this paper in order to realise the maximum benefits of reducing the visual impacts of existing infra-structure in protected areas and looking at how the selection process of new routes for electricity and gas transmission can be improved where we are working locally. This would also help us to deliver a consistent approach at a local level. Early discussions on the approach and implementation would benefit partnership working with all stakeholders including the local planning authority.

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