Received by email

The response below is on behalf of the Peak District National Park Authority.

The Authority welcomes the positive moves by both National Grid Electricity Transmission (NGET) and Ofgem to initiate limited funding of the cost of mitigating, mainly by undergrounding, existing obtrusive high voltage (275 and 400kv) overhead power cables and pylons through a spending allowance which is restricted to National Parks and Areas of Outstanding Natural Beauty (AONBs).

We note that the allowance you have proposed to set will be made available over the course of the April 2013 to 2021 price control period, but we are mindful of the long lead-in time required for the inevitably complex engineering and logistical design work and stakeholder consultation involved in any significant refurbishment of high voltage power lines, let alone the extra complication of a possible undergrounding or surface troughing solution. This has been evident during extensive negotiations the Peak District National Park Authority is having with National Grid concerning the proposed replacement of the 400kv line through Longdendale, at the northern end of the Peak District. This is the most significant of the few incursions of transmission lines into this National Park. In fact, undergrounding the most obtrusive section of this transmission line, mainly alongside the Trans-Pennine Trail, might exhaust the spending allowance you are proposing initially to permit for all the National Parks and AONBs throughout England and Wales.

Therefore, we would like to see more information on procedures for selecting suitable projects to be put forward as candidates for funding. We would prefer to see a well-focused selection process, rather than too long and complex, particularly if relatively few schemes can be afforded because of the limitation on finance being made available in the foreseeable future.

In evaluating the costs and benefits of possible schemes, we have advised in our work with National Grid that the Longdendale transmission line in the Peak District crosses a conservation area village, so the cost / benefit evaluation needs to include not only the present impact of overhead lines and pylons but also the additional complexity and cost of undergrounding through a historic residential area, with a multiplicity of existing services. To balance that, however, is the significance of the benefit of removing the pylons from the skyline of the conservation area. In addition, this transmission line and many of the most obtrusive distribution lines in the vicinity and elsewhere cross additionally protected areas of open landscape of high nature conservation value, so this requires a process which would ensure the visual benefits of undergrounding whilst at the same time avoiding or minimising biodiversity impacts.

In our discussions with National Grid we have recently been advised that there may be technical solutions being developed which could prolong the life of the pylons in Longdendale. If this was so we assume the same techniques might be applied to other overhead routes. This suggests that there might in future be a move to more piecemeal replacement of pylons, rather than finding undergrounding solutions. At this stage we are not well enough informed to debate the merits or otherwise of the possible new techniques, and we would still wish to see the Longdendale route and others in National Parks and AONBs put forward for undergrounding.

In view of your acknowledged need to ensure that customers receive a consistent supply of electricity, it is obviously important that any renewal of cables and other infrastructure is carried out to a very high standard, but undergrounding ensures that in the most exposed locations, typical of protected landscapes, winter power cuts are kept to a minimum. What is also evident from National Grid's consultants' customer survey is that the public are willing to pay a modest additional sum of money as a contribution to visual amenity mitigation, preferably by means of undergrounding, as opposed to screening by trees etc. Therefore, your somewhat limited response to National Grid's initial recommendation for a more generous concession to undergrounding of their transmission lines and pylons hardly acknowledges the extensive research carried out by 'Accent', a leading 'Willingness to Pay' market research company, which informed their advice to National Grid.

Working regularly with the three DNOs covering our area (Western Power Distribution; Electricity North West; and Northern Powergrid) we have had a successful and rewarding experience initiating and implementing lower voltage undergrounding schemes over the past seven years. Despite a slow start, halfway through the second price control period (2010-2015) the engineers we are working with

are now completely familiar with the project and enthused about its visual, engineering and power supply benefits, and the spending scope is fairly significant in terms of the iconic views and village conservation areas enhanced. As a result, we believe this success should and can be replicated in terms of removing some of the worst examples of high voltage transmission lines and pylons which currently mar some of the most attractive, protected landscapes in the country, both within and on the edge of many of our National Parks and AONBs. In this respect we would also welcome a greater degree of flexibility for cross-boundary funding, rather than the 10% limit referred to, given the greater significance of transmission pylons when viewed from within protected landscapes compared to the wooden poles involved in the current DNO scheme.

Your initial proposal of £100 million to fund mitigation of the visual effects of transmission lines, ie. tree screening or undergrounding, pending further research and feedback from stakeholders, is obviously a low figure, but if it is only a means of starting work on suitable projects, as interpreted by Anna Kulhavy at the 8 August workshop, it could be a way of launching a number of significant initiatives throughout the country. We believe strongly that, despite your undoubted objective to protect the interests of existing and future consumers, whenever National Grid assets need replacing there can be opportunities for undergrounding or screening with trees. Therefore, we are pleased to welcome the proposed allowance, provided it is seen as a means of 'kickstarting' selected mitigation schemes with some initial investment, to enable National Grid to progress preliminary research and engineering appraisals of specific projects.

We look forward to the opportunity to work with you further on this initiative if it progresses.

Peak District National Park Authority, Aldern House, Baslow Road, Bakewell, DE45 1AE t:01629 816200 f:01629 816310 www.peakdistrict.gov.uk Twitter: @peakdistrict
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