

## RIIO-T1: Initial Proposals for National Grid Electricity Transmission and National Grid Gas

### Response to Q 2 by South East and Eastern Undergrounding Steering Group

1. We welcome 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. We are concerned that there appears to be a lack of collaborative working between those delivering projects relating to undergrounding existing cables and proposed new lines. For example, the proposed Bramford to Twinstead 400kV line is proposed to be undergrounded through the Dedham Vale AONB and adjacent Stour Valley. This line runs in close parallel to an existing 400kV line which is currently not on National Grid's list of 9 candidate schemes for undergrounding existing infrastructure.
4. 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.
5. 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.
6. 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?
7. We have concerns about "the use it or lose it philosophy". We understand the need for setting timescales for delivery , however given the Steering group'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.
8. 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. We suggest that the governance arrangements, relating to the expenditure of the allowance, are designed to ensure that the selection of the schemes is targeted to provide the greatest landscape benefits. It would therefore make sense therefore to use local knowledge to direct the selection and prioritisation of schemes so the decision making process does not lie solely with the transmission provider.



