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Mr Grant McEachran  
Ofgem/Ofgem E-Serve  
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17<sup>th</sup> September 2012

Dear Mr. McEachran

**RIIO –T1: Initial proposals for National Grid Electricity Transmission and National Grid Gas**

Visual Amenity

We agree that National Grid should be required to address the visual amenity impacts of new and existing transmission infrastructure in an effective way through early stakeholder and local community engagement.

We welcome the proposal for an allowance to underground existing transmission lines which have an impact on National Parks and Areas of Outstanding Natural Beauty.

General comments

The Suffolk Coast and Heaths and Dedham Vale AONBs have been involved in delivering small-scale undergrounding schemes since the allowance became available for distribution network operators to improve the visual amenity of their network within Protected Landscapes. We have achieved a great deal in partnership with the distribution network operator and local communities in this region.

We believe Ofgem should re-consider the 'use it or lose it' suggestion. Our experience of dealing with smaller scale undergrounding schemes (11Kv and LV) on the distribution network has proven that negotiations can sometimes be protracted. We would anticipate, when dealing with the transmission network, a greater degree of complexity would lead to equal if not extended negotiation and consultation timescales and therefore, there should be a mechanism for carrying forward committed expenditure beyond the RIIO –T1 period. Failure to do this could lead to a reduced allowance in future years to deliver schemes because those from the RIIO –T1 period were still in progress.

We see great merit in establishing a similar governance structure to that which exists for the east and south east of England Protected Landscapes, but on a national scale, for the allocation of the proposed RIIO-T1 allowance. Proposed schemes must be rigorously tested against the overarching aim to improve visual amenity. The decision should not rest solely with National Grid or other transmission operators who may give greater weight to other considerations such as the need for upgrading of existing lines. Solely focussing on required maintenance of overhead lines through replacement with underground cables as the means for determining schemes would not give best value in terms of delivering improvements to natural beauty in AONBs & National Parks, where they are most needed.

The allowance should not be used to the transmission operator's advantage as a means of replacing transmission networks that are due for refurbishment. Claims against the allowance for maintenance should be resisted and safeguards should be put in place to ensure that the allowance is used for the purpose it is intended and the purpose to which the WTP study focussed on, i.e. the improvement to visual amenity.

We accept however, that for economic reasons, schemes which involve lines that are due for refurbishment but that also score highly in terms of visual amenity benefits may be prioritised, and that economy will form part of the decision-making process.

We are concerned that any possible undergrounding of the distribution network carrying 33 kV and 132 kV lines on metal towers is hampered by the level of allowance available within DPCR 5. The scale of the allowance under DPCR 5 is not sufficient to underground these higher voltage lines, where the cost of dismantling metal towers is prohibitively expensive. Neither would the RIIO –T1 allowance be able to deal with this matter, given that the lines in question are part of the distribution network. We urge Ofgem to consider how this anomaly can be addressed to ensure that the available allowances complement each other to ensure the best possible improvements to visual amenity in National Parks and Areas of Outstanding Natural Beauty. An example includes the 132kV line through the Dedham Vale AONB which significantly detracts from landscape character of the area.

It should be noted that Suffolk County Council is putting considerable resources into raising the profile of Suffolk as *the Greenest County*, a policy which benefits tourism and many other businesses in the County as well as the environment. The

improvement of visual amenity which can be gained from the removal of overhead power lines would have a significant impact beyond the landscape itself in terms of economic and social benefits.

#### Suffolk Coast & Heaths AONB

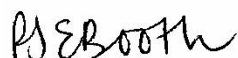
The suggestion that the existing Sizewell to Bramford line through the Suffolk Coast & Heaths AONB could be undergrounded is of course welcomed. Given that the Suffolk Coast & Heaths AONB is the only AONB within which a new nuclear power station is proposed, any mitigation against the cumulative visual impact of such a major development in an incredibly sensitive location is welcomed. Use of the allowance should not diminish the developer's requirements to properly offset the impact of that development, but should be seen as an addition to what would be required to secure planning consent. We welcome the inclusion of this AONB on the current shortlist which has been announced by National Grid.

#### Dedham Vale AONB

We have more concern about the fact that the Dedham Vale AONB does not feature on the list, given the proposed undergrounding of the new Bramford to Twinstead transmission line through the Dedham Vale AONB and adjoining Stour Valley. The new undergrounded line is currently proposed to run alongside an existing 400kV overhead line. We believe this is evidence that the business plans for dealing with *existing* and *new* National Grid infrastructure do not take account of each other and therefore result in incongruous proposals to underground new whilst retaining existing overhead lines. We believe an effective use of this allowance would be to shortlist this scheme as a candidate alongside the others proposed on efficiency grounds, given contractors and plant will be on site to underground the new line and given that extensive public consultation and stakeholder engagement has already taken place.

Clarification is also needed as to how the issue of impact *on* Protected Landscapes will be addressed. The visual amenity impact of the transmission and distribution network includes areas outside the Protected Landscape itself. This matter has been addressed by National Grid with their announcement that the proposed new Bramford to Twinstead line will be undergrounded through the Dedham Vale AONB and the adjoining Stour Valley; of equal landscape value and incredibly important in terms of the setting of the AONB, but not currently afforded the protection of statutory designation.

Yours sincerely



On behalf of:

Cllr. David Wood, Chairman Suffolk Coast and Heaths AONB Partnership

Robert Erith, Chairman Dedham Vale AONB and Stour Valley Project Partnership