

P L A C E

7 8 APR 2006

Robert Hull  
Director, Transmissions  
OFGEM  
9, Millbank  
London SW1P 3GE

27/4/2006

RESPONSE TO THIRD CONSULTATION, MARCH 2006 – TRANSMISSION PRICE CONTROL  
REVIEW



Dear Robert Hull

Firstly many thanks for all your work on the consultation process and particularly the efforts to improve access to the network for renewable energy generators.

In general terms PLACE would like to see a fundamental re-prioritising within the entire Price Control Review process. Our proposal is that the TPCR should be re-structured with environmental considerations being the starting point from which all other decisions and proposals flow. The global impact of electricity generation on climate change is considerable and in order to reduce those impacts and try to ensure the safety of life on the earth, the TPCR must *begin* with the environment.

Please re-conceive the next TPCR with Environmental Considerations leading the document. Presumably this will require a real policy shift from the government with a full commitment to decentralised energy.

Regarding the earlier Distribution Price Control Review and the present TPCR we believe there has been a discrepancy between the two over the allocation of funds for environmental improvement expenditure. We ask that NGET is allowed to at least equal the expenditure of the distribution companies on such areas of work.

To turn now to more specific matters, during a meeting between PLACE and NGT (as it was then) in November 2004, Professor Steven Swingler, a principal academic advisor to NGT, was at pains to make clear to us how unreliable is the oft quoted figure of 15 – 25 times more expensive to underground than to go overhead. Every case has to be considered on its own merits and he considers it misleading to generalise about undergrounding costs. We note that the present TPCR does flag up a need to examine relative costs of overhead and underground systems very carefully.

PLACE would ask that costings for the "surface troughing" type of undergrounding be examined in great detail as NGET's claim (at the above mentioned meeting) that this type of installation is as expensive as full undergrounding seems unsustainable. It would seem to be particularly unsustainable on disused railway beds and ask that you look at the enclosed photos.

PLACE has been given the full backing of the CPRE in preparing a proposal for the "surface troughing" / undergrounding of a stretch of transmission line at Dunford Bridge in the northeastern tip of the Peak National Park which would lie along a disused railway. This power line is in NGET's programme for refurbishment and our proposals would in fact reduce the distance over which power needs to be transmitted. In relation to this proposal PLACE would ask that you ensure that TPCR policy would facilitate such a proposal.



with transmission towers



three transmission towers removed

Finally may we suggest that given the increase in severe climate events, including potential storms, incidents of icing etc. that due consideration is given to the desirability of increasing the amount of the National Grid which is underground, for safety of supply reasons.

Yours sincerely

Andrew Darke

# PLACE

Is a group of artists / initiators with a particular concern for landscape quality.

Less intrusive solutions to many environmental problems already exist but are not being used.

Often companies allege technical difficulties stop them using these solutions. With will and innovation these difficulties can be solved.

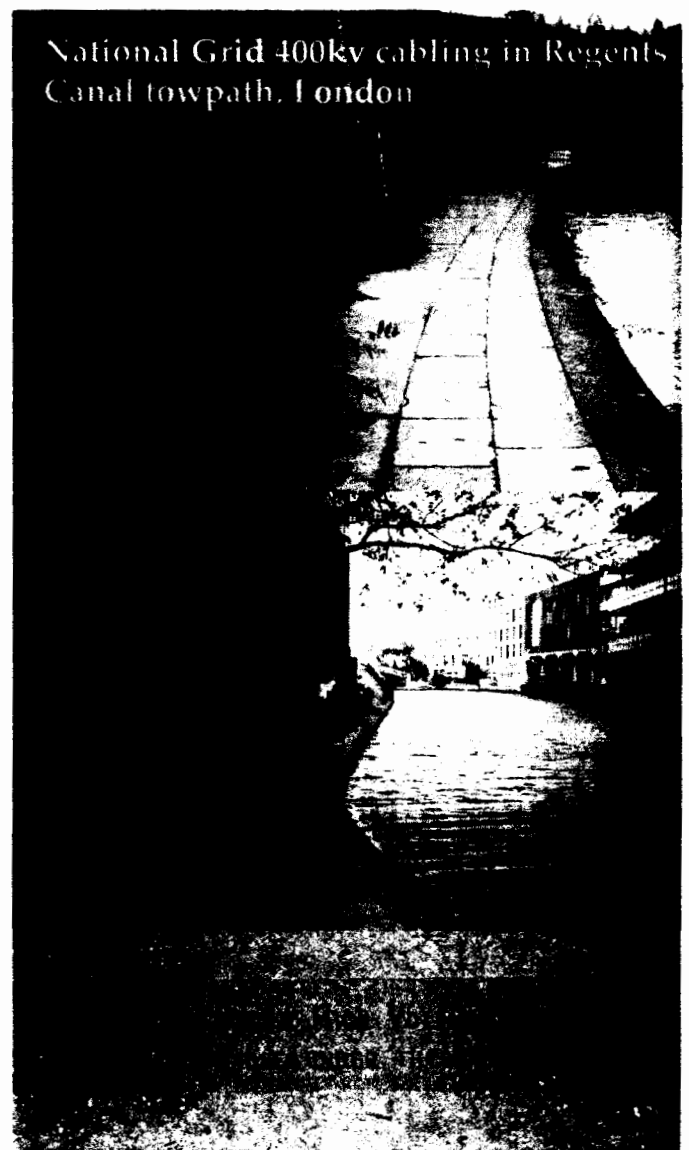
PLACE researches and documents examples of best practice, from the environment point of view, which could be used more widely. Publicity is needed to let people know that these less intrusive ways exist. Examples can be used as leverage on government and industry.

Example 1: The National Grid in the Peak National Park.

"Surface troughing" is much less intrusive than pylons. Woodhead, Yorks. grid ref. SE112 998



Example 2: The National Grid in London



### Example 3

#### Spot the Mobile Phone Base Station



Crieff, Scotland; grid ref. NN864 224; Vodafone site No. 4788

There is only one such base station in the UK as far as we know; there are about ten in Norway. This technique could vastly reduce visual intrusions in rural and semi-rural areas.

*Most people are familiar with the idea of endangered species. We believe there are also endangered experiences. An empty sky, for instance, or the dark of the night sky unaffected by manufactured light, both of which would have been common experiences in the relatively recent past, have all but disappeared from the British Isles. Spatial freedom in landscapes clear of human structures is ever more rare. Absolute aloneness is difficult to find.*

*A sense of the frailty and inconsequence of human life, when immersed in the vastness of the elements, gives a much needed and powerful change of perspective. We believe that humanity is diminished by the ongoing loss of such experiences. Many of these losses are unnecessary.*

PLACE produces artworks, exhibitions, papers for publication and raises issues surrounding art, public art, aesthetics, society, infrastructure, architecture and the environment.

contact: Andrew Darke tel. 01594 562646

place@clearhorizons.fsnet.co.uk

Jonathan Adamson tel. 01484 536103

[www.viewsvistasandreverie.org](http://www.viewsvistasandreverie.org)

[www.atlasplace.clara.net](http://www.atlasplace.clara.net)

[www.clearhorizons.fsnet.co.uk](http://www.clearhorizons.fsnet.co.uk)