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22. 10. 2006

Robert Hull  
Director, Transmissions  
Ofgem  
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Dear Mr. Hull

**Transmission Price Control Review (TPCR) - Under-grounding Meeting, 7. 9. 2006.**

Thank you for meeting with Andrew Darke and myself on the above occasion.

I enclose a letter written to John Lomas ((JL), Director of Conservation and Development, Peak National Park Authority). Our letter lays out the situation with regard to undergrounding the National Grid (NG) in rural areas, as we see it at present. ***We strongly recommend you read it in full.***

- In the TPCR meeting, Ofgem quoted an additional cost of 15-25 times for all NG undergrounding. Since we challenged those figures in the meeting, Ofgem said they would like to see some (alternative) figures. ***The cost Ofgem quotes for NG's replacement of cables in the Woodhead Tunnels is less than 10 times the cost of an overhead transmission line (JL p.1). This chimes well with approximately 8 times the cost for undergrounding we were quoted informally by Ove Arup some years ago.***
- Our letter to JL, as a whole, makes a case for greater progress in initiating new NG 'undergrounding' schemes, and for building on and extending existing NG 'undergrounding,' primarily in rural areas, particularly where NG's overhead transmission system affects National Parks and Areas of Outstanding Natural Beauty.

In this respect PLACE supports (as a minimum, national aspiration) the proposal outlined in Dr. Richard Cowell's: *The Scope for Undergrounding Overhead Electricity Lines*, a report by the UK centre for Economic and Environmental Development for Friends of the Lake District, UK CEED: Peterborough, issued in October 2002:

"During the construction of the national grid between the 1950s and the 1970s the (then) Central Electricity Generating Board placed about a dozen significant, rural stretches of high voltage lines underground, where the government minister and/or the Board regarded the environmental circumstances as extenuating (including river crossings with a predominantly technical motive). It could be argued that, during the refurbishment of the grid, the *next ten* most intrusive stretches of line ought to receive similar treatment. This could then lead to potentially high profile initiatives,

the NGC and other organisations to decide which ten stretches of line would benefit most from undergrounding (or line removal), and in which private and public funding are combined.”

- The reliance on the “consents process” and public enquiries as the exclusive, *case by case*, route for considering “the interests of consumers in terms of visual amenity” - *in fact, a much larger and more profound issue* - seems inadequate given the apparent desire and willingness of a significant section of the UK public to pay higher electricity bills for *ongoing* undergrounding of the electricity distribution network in rural areas.
- We believe NG’s forthcoming cable replacement work at Dunford Bridge and Woodhead, provides a unique opportunity to enhance the ‘undergrounding’ in the Woodhead Tunnels at their entrances/exits. (The ‘undergrounding’ through the tunnels resulted from a public enquiry in the 1960s). *See our letter to JL for a fuller outline of the special circumstances found there.* An extension of ‘undergrounding’/surface troughing at Dunford Bridge would also provide a remarkable opportunity for an innovative pilot scheme and study. We believe this should be underpinned by research and development funding,
- We also believe adjustments in the setting of the Transmission Price Control (TPC) are necessary to encourage NG to be more robust (and innovative) in meeting its Schedule 9 and other environmental duties. An ‘undergrounding’ allowance extended to the NG which is equivalent to the one which already exists for the electricity distribution network, would at least be fair at the present time and a move in the right direction.
- In relation to any adjustments of the TPC, we would also point out the considerable symbolic power of ‘undergrounding.’ *Ongoing*, national reductions in the intrusiveness of the NG would demonstrate government and corporate concern for the quality of the environment we depend upon and shape - *in a way which transcends the purely economic.*

To illustrate the kind of sensitivity and awareness we are talking about, we reproduce a letter by Jim Perrin (Powys, Wales), published in The Guardian on 22. 9. 2006:

“George Monbiot writes (G2, September 7) that ‘If we had [£20,000] it would be better to pay someone to put a wind turbine on a mountain.’ And hence destroy the affective power of some last remnant of our wild landscape in Britain? A true holistic approach would acknowledge an aesthetic dimension in our necessary dealings with nature, and not simply endorse another act of vandalism against it. Our mountains are a rare, precious resource. Of course we need ‘sustainable energy’; but we also need the spiritual and aesthetic sustenance that the presence of underspoiled nature can bring. ***There is a balance to be struck here*** [our italics and bold]. I find it sad that an important proponent of our sustainable eco-pieties should so glibly and selfishly consign the integrity of wild Britain to such destruction.”

Yours sincerely,

*Jonathan Adamson*

Jonathan Adamson PLACE. Enc. Copies to CPRE, PNP, CNP.

along the lines it was confidential, and we would find out at a later stage. (Some months before this Aileen told me NG would have to approach the planning authority/authorities by spring 2007 to meet a 2008-10 schedule.)

Passing on, a number of things have occurred to me since we met (you may already be aware of everything I have to say).

Assuming NG plans to transfer and replace their cables in the Woodhead Tunnels as part of the programme of works for which the Peak District National Park Authority (PDNPA) have received notification - refurbishment of pylons in Longdendale (in 2007?) - presumably the **4.7km x2 of new cabling, in a separate tunnel**, in the Woodhead Tunnels, **with the attendant works at each end of the tunnels** (Dunford Bridge and Woodhead), counts as **new transmission infrastructure** or, at the very least, as **major refurbishing work**.

NG's Schedule 9 Statement (preservation of amenity) clearly states "Commitments 4-7 relate to all works (my underlining, italics and bold), while 8, 9 and 10 relate to specific topics of environmental impact assessment, **consultation** and reviewing this statement."

Commitment 6 under "Enhancing the environment around our works" states: "When undertaking works, *we will consider what practicable measures can be done to enhance areas in the vicinity of the works for the benefit of the local community or the natural environment.*" (My italics.)

Commitment 9 under "Consultation and liaison" states: "When planning works that will have a high impact on a residential area or a site valued for its amenity, we will consult with local interest groups and residents, with the aim of identifying key environmental issues which can be taken into account and more effectively mitigated. ***In order for consultation to be most effective it will be done at a stage where the results can be used to influence the design of the project.***" (My bold and italics.)

Brian Taylor, Policy Planning Manager, Peak District National Park Authority (PDNPA), emailed Aileen Smith in response to NG's Schedule 9 consultation on 25. 5. 2006. In his email he sets out PDNPA policy in relation to NG's environmental duties.

In particular he says: "The long term objective for the National Park is to seek conservation and enhancement of the valued characteristics of the area and a key opportunity to achieve this goal is where there are opportunities to replace ageing infrastructure in ways which reduce their impact on the built and natural environment. The undergrounding of new or upgraded utility services is established in Policy LU2 of the Peak National Park Local Plan."

*Given the specific circumstances surrounding the anticipated cable replacement work in the Woodhead Tunnels, it seems to PLACE there is a real opportunity to demonstrate to NG that a much less intrusive transmission system could be implemented at Dunford Bridge, than exists at present, **within their projected budget**, which would satisfy their Schedule 9, and other*

*environmental duties.*

It seems almost certain to us, the present alignment of the 400kV overhead transmission line ('otl'), at Dunford Bridge, was the result of the electrified Manchester to Sheffield railway being in use at the time of its construction.

Since the decommissioning of the railway, we can see no obvious reason why the surface troughing ('st') we assume NG intends to install in the 'new' tunnel (which, we also assume, will more or less replicate the existing 'st' in the old tunnel), could not continue along the flat railway track bed at Dunford Bridge to (at least) a replacement cable sealing end ('cse') on the other side of the River Don.

This would simply be an extension of what already exists at the Woodhead end of the tunnels, where the surface troughing/'undergrounding' ('st/'u") will, in any case, have to be re-routed to the 'new' tunnel.

We recognise 'st'ing at Dunford Bridge would probably require some form of (shallow?) 'undergrounding' in the track bed of the Trans-Pennine Trail (perhaps not unlike that which accommodates NG's 400kV cables in the Regents Canal towpath, in London).

***NB: The Central Electricity Generating Board (CEGB) did not see a need in the 1960s to construct the 'cse' above the tunnels at Woodhead, as was done at Dunford Bridge, presumably because the 'st' at Woodhead was not in conflict with the electrified railway line, in use at the time. CEGB must have thought that continuing the 'st' out of the tunnel entrance at Woodhead for approximately a quarter of a mile to a 'cse' constructed beside the railway track bed, was the best solution in the circumstances. Presumably, they also thought that this was the most economic solution.***

*Indeed, is it far fetched, in the light of adjustments to increasingly extreme weather conditions, to suggest that 'st/'u" may be the best 'security of supply' solution at Dunford Bridge, and in many other places?*

I am sure we all agree the removal of at least three pylons at Dunford Bridge would make a very substantial difference to the quality of the area; and that more extensive lengths of 'st/'u" of the 'otl' along the Trans-Pennine Trail would transform people's experience of Longdendale, inside the PNP, and of the Upper Don Valley, along the park's boundary to the east of the Pennines, in a very significant way.

It seems possible, to us, NG may not have thought of using 'st/'u" at Dunford Bridge as part of its cable replacement program in the Woodhead Tunnels. It may only require the PDNP Planning Authority to draw 'st/'u" to their attention for NG to see its environmental, engineering and economic advantages. ***The 'st/'u" route we are suggesting entails shorter cable lengths than the existing overhead lines, with, on the face of it, perfect conditions for implementation.***

Hector Pearson (NG, Land and Development Manager), has already said:

“The cables at Woodhead are reaching the end of their asset life and will be replaced within the next ten years, with new cable technology, which are not oil filled and therefore have less potential for environmental pollution. As part of these works it is likely that there may be an opportunity to review the arrangement of towers at the Dunford Bridge end of the tunnel with the aim of improving the visual appearance of our existing sealing end compound at this site. This is something we will however discuss fully with the National Park authority when the works are being planned.” Letter to PLACE, 2 July 2003; CC National Park Officer - PNP.

Aileen Smith confirmed, about six months ago, that non oil filled cable would be used in the Woodhead Tunnels.

As you know PLACE attended Ofgem’s “Transmission Price Control Review - Under-grounding Meeting,” on 7. 9. 2006.

Ofgem’s representatives informed the meeting that Ofgem was not minded to extend the allowance made for undergrounding distribution cables to NG’s transmission system, but that Ofgem was still consulting on this. In their written response they state under Ofgem’s views (1.63): “We continue to be unconvinced that there is a clear case for an undergrounding allowance. Our position has been informed by views on the costs and benefits of such an allowance. In addition, we recognise that the consents process for transmission infrastructure offers the public an opportunity to express its concerns.”

Under Visual amenity (11.12) they also say: “The construction of new transmission lines generally requires planning consent, and for large projects this can involve a public enquiry. The planning consent process is an important vehicle through which the interests of consumers in terms of visual amenity are considered.” Email to Ruth Chambers, Acting Chief Executive, Council for National Parks, 25.9.2006.

This suggests that Ofgem considers public enquiry, at the present moment, to be an adequate way to evaluate any *national* desire to instigate *ongoing* reductions in the *negative impact* of NG infrastructure in *National Parks*, AONBs, green belt or the countryside generally, ***in spite of public enquiries being confined to case by case judgements.***

Ofgem’s position seems at odds with their own “customers’ willingness to pay for improvements’ survey, carried out as part of Ofgem’s customer survey report, 29. 9. 2003. The survey, which covers distribution cables, found that 40% of customers were willing to pay on average £2.70 extra per month for undergrounding the distribution network.

On our calculation this would generate approximately £356,400,000 per year, for this purpose, year on year. We are not aware of any mechanism to test these findings; or of any methods aimed at collecting any part of this revenue for this purpose (billing, etc.).

If National Grid's infrastructure were subject to a similar 'willingness to pay' survey, it is hard to imagine the findings being very different. Has such a survey has been carried out by Ofgem? *We respectfully suggest that the findings of a survey of this kind should be a key element of any judgement which is made about the importance of reducing the considerable, negative impact of the National Grid in the UK landscape.*

In the meeting, Ofgem also said: *if the difference in the cost of undergrounding was found from elsewhere, there would be no problem in implementing it. As an example Ofgem cited the 2012 Olympics, where Government is paying for undergrounding the site.* (It has to be said, this was not something PLACE found in its meeting with NG on 15. 11. 2004. When PLACE presented the representatives of NG with this possibility, at best, their attitude seemed ambivalent.)

*NB. It would be very useful to know the actual costs for undergrounding the Olympic site.*

It is striking the Government is in a position to make decisions like this on our behalf, but that public opinion seeking similar outcomes for similar reasons "they are ugly . . . an eyesore" etc., are stymied by the regulatory environment, bureaucracy, legal process, shortage of resources within environmental authorities etc., in a 'democracy.'

Since the cable renewal work at Dunford Bridge could be deemed *new transmission infrastructure*, or, at least, *major refurbishing work*, and since there is an apparent opportunity to build on, and enhance, the 'undergrounding' connected with the Woodhead Tunnels, which resulted from a public enquiry in the early 1960s (initiated for amenity reasons), this seems a very important moment to press for real improvements in NG's transmission infrastructure at Dunford Bridge, and, since the issues are identical, elsewhere, at the very least where the NG impacts on nationally designated landscapes.

It seems to us the way NG carries out its renewal/refurbishing work in, and beside, the PNP, will provide a fundamental test of present environmental legislation.

We look forward to hearing from you.

Yours sincerely,

Jonathan Adamson **PLACE**

Cc to CPRE, CNP, Ofgem.