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**Consultation on our assessment of National Grid Electricity Transmission's proposed
Visual Impact Provision policy.
Response by South East and Eastern Undergrounding Steering Group**

Thank you for the opportunity to respond to your assessment of National Grid's revised Visual Impact Provision Policy. The South East & East of England Undergrounding Steering Group, comprising 9 protected landscapes and chaired by Natural England has the following comments to make on some sections of the revised document:

2: What can the Visual Impact Provision be used for?

We support the principle that the policy applies to lines 'adjacent or in close proximity' to protected landscapes. This scenario needs to be clearly covered in the methodology for assessment to ensure that lines having an impact on a protected landscape are identified.

We support, but would like to seek clarification that the term 'other works' does include installation of new infrastructure

3: How will we use the Visual Impact Provision

The process chart states that 'cases arguing for other transmission lines that lie adjacent and in reasonable proximity to a National Park to be included in the assessment will be considered on their own merit...' It is not clear who will have the opportunity to make this case, i.e. do local areas need to put a case together or will the initial desk top assessment identify these potential cases?

We are pleased to see that the visual impact of existing infrastructure will be assessed using GLVIA3 methodology and will be carried out by suitably qualified landscape professionals. We are concerned that carrying out this level of detailed assessment for all possible schemes from the outset could take some considerable time resulting in a reduced period for delivery. An objective judgement will be essential at the stage of final selection, given that the starting point is that all protected landscapes are of equal value.

We would urge Ofgem to consider imposing a cut-off point early in the Price Control period where all of the assessments must be completed in order that a final selection of schemes can be identified for further investigation. This would afford sufficient time to consult, design and deliver a scheme within the Price Control period.

As it stands, the proposed process will inevitably result in a huge amount of redundant evidence being gathered. We question whether it is a realistic proposal to assess all schemes, albeit at a high level, from the outset of this Price Control Period and are concerned that this could be at the expense of delivery.

5: Engagement with stakeholders

A clear timeframe should be established to clarify at which stage each of the relevant consultees will be involved, i.e. other stakeholders, wider public engagement etc.

7: Review of this document

In results of feedback, National Grid state that they will not be seeking to increase the Visual Impact Provision beyond £500m, but will keep the matter under consideration and may review their position later in the price control period. We want National Grid to make a firm commitment to review their position on this matter, when they review the Visual Impact Provision policy in 2017.

I trust that these comments will be given your consideration.

Yours sincerely

Natural England (Independent Chair), UK Power Networks Project Officer, Suffolk Coast and Heaths AONB (Eastern Voting Member); Dedham Vale AONB and Stour Valley Project (Eastern Voting Member); Norfolk Coast Partnership (Eastern Voting Member); Broads Authority (Eastern Voting Member); the South Downs National Park Authority (Southern Voting Member); Kent Downs AONB (Southern Voting Member); Surrey Hills AONB (Southern Voting Member); High Weald AONB (Southern Voting Member), the Chilterns Conservation Board (Eastern Voting Member)

