

Consultation RIIO-2 Sector specific Methodology Annex: Electricity Transmission

Comments from Professor Chris Baines on matters relating to paragraphs 4.85 to 4.114.

I am an independent environmental consultant and a landscape architect, Hon National Vice President of the Royal Society of Wildlife Trusts, and Patron of the Countryside Management Association.

I have chaired the Stakeholder Advisory Group for National Grid's *Visual Impact Provision (VIP)* programme since its inception at the beginning of 2014.

I am confident that the processes and output targets established under RIIO-1 should be adopted on a similar scale as a core element of RIIO-2. The investment made over the past five years has already established an exceptional legacy of mutual trust and understanding and has also secured a unique information base for a great many of the country's most precious landscapes, where electricity transmission lines have had a significant visual impact for many decades. It is important to build on this investment both for existing lines and for proposed new lines.

I also believe that the VIP process of structured, sincere and multi-layered consultation has enough merit to be promoted wherever other land users have a need to embrace stakeholder management.

PRE-EXISTING LINES

- The programme should continue to be focussed in National Parks, Areas of Outstanding Natural Beauty and designated landscapes of high scenic importance.
- There should continue to be flexibility regarding the visual impact immediately beyond the boundary of designated landscapes, where there is significant impact on the views in either direction, or where this allows for the most sensitive or cost-effective accommodation of associates physical structures such as sealing-end compounds.
- The national Stakeholder Advisory Group benefits from representation by both government agencies and charitable non-government organisations. It also benefits enormously from access to senior staff and consultants from National Grid and from the regulator. The diversity of professional experience and the contrasts in organisational culture are particular strengths.
- Whilst visual impact should continue to be the initial criterion for site selection, the potential ecological and archaeological impact of any improvement works should be given full consideration as early in the development process as possible. Whilst permanent damage to habitat needs to be avoided, support should continue to be given to schemes where temporary habitat loss can be more than compensated for by long term landscape restoration and ecological management.
- The process of genuine and deep-rooted stakeholder consultation has been fundamental to the success of the VIP in RIIO-1. This begins by combining the technical excellence of senior professional engineers with the experience, expertise and reliable commitment of the external members of the national Stakeholder Advisory Group. Equally importantly it extends

to the thoroughness of consultation at local landscape and community level. In RIIO-1 this process of engagement has proved to be a very cost-effective way of building mutual understanding between the professional staff of the National Grid, their specialist consultants, and a wide range of individuals with complementary landscape skills and links into the wider stakeholder community. It has helped to tackle complex issues, to avoid conflict and to build consensus.

- The VIP programme is aimed at achieving maximum positive impact in the country's most sensitive and technically challenging landscapes. This demands an exceptionally thorough approach to survey and analysis and requires enough time to consult thoroughly and to amend proposals accordingly. In RIIO-1 the 8-year time frame was judged too tight to address some of the most complex but deserving landscapes, so there is understandable concern that the 5-year timeframe for RIIO-2 could be even more restricting. It would therefore be very helpful for the established landscape analyses and other general support work to be carried over into RIIO-2. In addition, and particularly in the case of more complex major schemes, it would be beneficial for some of the initial survey, ground investigation and consultation work to be carried out in what remains of T1 and ahead of the start of T2 to allow for a rapid start-up for the next round of schemes.
- Furthermore, whilst I agree that it would be sensible to identify potential major schemes for the provision ahead of the start of T2, I do not believe that achieving this and submitting fully costed projects by 1 July 2019 is realistic. This target date should be put back into 2020 to enable the transmission operators to undertake some preliminary work – most significantly with local stakeholders – to establish both the technical feasibility of and stakeholders / community desire for the project.
- The “customers’ willingness to pay” assessment may need to be repeated, but it is important for this to make use of the very tangible examples that now exists as a result of RIIO-1. Although it is still too early to have completed schemes where transmission lines have been physically removed, we now have real examples of selected landscapes, a clearer understanding of the challenges involved, testimonials from local and national stakeholders to endorse the sensitivity and thoroughness of the adopted approach to landscape intervention, and useful tools such as photo-montage to help with communication.
- One source of frustration experienced in the VIP programme for RIIO-1 continues to be the mis-match between the timing and renewal programmes between the National Grid and the distribution companies. Whilst local and national distribution require different scales of pylon, they frequently follow closely aligned routes through the landscape. Removal of the very large National Grid installations will undoubtedly deliver very significant landscape improvement, but it would be extremely helpful to be able to integrate the removal of all transmission lines (particularly those located on steel towers) in a selected landscape. It is unsatisfactory to be forced to leave low-level distribution lines standing in a landscape deemed worthy of investment in the removal of National Grid Lines. It would therefore be helpful if RIIO-2 could find ways of achieving greater co-ordination across the electricity distribution industry.

FUTURE TRANSMISSION LINES:

- The VIP programme in RIIO-1 has developed a very robust process of landscape analysis and stakeholder consultation. It has also allowed for national stakeholders to explore wider issues in a spirit of well-informed mutual trust. This has been a significant and welcome learning curve for all concerned and it is now a unique facility which should be used to inform decision making regarding new transmission projects. The national Stakeholder Advisory Group could perhaps play a useful role as a sounding board for both the regulator and the transmission companies, with the possible adoption, for example, of a twice-yearly future meeting and creative exchange of views. This would help the company to anticipate potential points of conflict and sustain the on-going commitment of the various stakeholder organisations.
- Having invested so much time and effort into close collaborative working with regard to long-established transmission lines through special landscapes, there is now an expectation among stakeholders, that the insensitivity of some of the historic 20th century transmission lines should not be repeated with future projects. It would seriously damage the reputation of the participating national stakeholders if their efforts to achieve visual improvement through RIIO-1 VIP failed also to reduce the visual impact of new transmission lines in the 21st century.

Landscape Enhancement Initiative

- Relatively small grants for landscape improvement were seen by national stakeholders as a very worthwhile element of the VIP programme. They are managed through the National Parks and the AONBs but are being used to facilitate relatively rapid landscape change, to spread the impact of VIP much more widely, and to engage the practical involvement of a wide range of other Non-Government Organisations in the process of Visual Impact Provision. This source of funding has been enthusiastically welcomed by landscape organisations and is already delivering valuable landscape enhancement. However there has been great frustration with the laborious process of grant approval. This has resulted in delays of almost a year between the submission of some applications and the release of funds.
- There is an extremely robust and transparent system in place for assessing applications and protecting financial investment, and the hope is that the Landscape Enhancement Initiative can continue into RIIO-2, that the regulator will place greater trust in the established vetting procedures (taking the burden off the regulator), that some of the allocated funds can be used to provide greater practical help with the application process, and that LEI will grow in its ambition and its capacity to underpin the work of the various landscape agencies at a time of increased financial uncertainty. With that in mind, I believe that the amount set aside should be of a similar order of magnitude to that currently available, rather than the 5 percent suggested in this consultation.

- LEI is already being admired by other national funding agencies such as the National Lottery and independent charitable benefactors and it is making a tangible difference in a wide range of very special landscapes.

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