

Thank you for the opportunity to comment on these proposals. We have reviewed them with reference only to the visual amenity impacts of transmission infrastructure, in which we have an active involvement as a member of the Visual Impact Provision (VIP) Stakeholder Advisory Group. We would like to provide the following comments.

**ETQ45. We welcome views on incentivising the TOs' engagement with stakeholders on the development of new transmission projects through our stakeholder engagement proposals, for example through the use of a survey.**

We support the principle of improving engagement with stakeholders around new transmission projects and the transparent assessment of how the different factors are weighed up when designing new infrastructure e.g. technical considerations, visual and socio-economic impacts and cost to energy bills. This is consistent with the transparent approach to assessing existing infrastructure and mitigation options as part of the VIP. In our view, new infrastructure should be evaluated in an integrated manner with the mitigation of existing infrastructure to ensure that the whole network is designed consistently in a way which is sensitive to landscape impact.

We note the proposal to capture stakeholders' satisfaction with TOs' engagement on new transmission projects via a survey of those affected by new grid projects. We agree that it would be beneficial for any such survey to cover aspects such as engagement opportunities, quality of information about a project and transparency of TO decision making. We fully support the engagement of all those potentially affected and the transparent assessment of any impacts using industry best practice methodologies. We have some reservations over whether the survey results would be objective given the likelihood that new infrastructure affecting their locality of (particularly) local residents is likely to be highly emotive. This underlines the need for close engagement and transparency and would require measures to account for subjectivity in the application of the survey results.

**ETQ46. Do you have views on retaining the existing scheme to mitigate the visual impact of pre-existing transmission infrastructure in designated areas? Do you agree that any decision to implement new funding arrangements should be subject to updated analysis around willingness to pay?**

We fully support the output to efficiently reduce visual amenity impacts of existing lines on protected landscapes and the retention of a mitigation scheme. Our experience of being involved in the VIP has been very positive; we are confident in its delivery of real landscape enhancements and strongly support its continuation. We agree that such mitigation projects should be implemented in the context of consumer willingness to pay. It is important that mitigation schemes have a clear mandate from consumers on a national basis.

We support consumers being surveyed again to confirm their willingness to pay for mitigation projects in RIIO-ET2, given that the 2012 National Grid study explicitly covered only the RIIO-ET1 price control period. However, we note that finding of the 2012 survey was a willingness to pay of over twice the £500 million allocated in RIIO-1.

We note the proposal that TOs should include proposals for mitigation projects as part of their RIIO-ET2 business plan submission and would support opportunity for the TO's User Group to comment. However, we share Ofgem's concerns over the potential uncertainty of project cost at the time of the business plan submission, since the costs are necessarily revised iteratively based on the ongoing design and environmental assessment processes. It may not be appropriate for challenge groups to comment on early estimates of costs, which would be revised several times during the project design phase. In addition, there is the potential for the business planning timescales not to align well

with consultation with local people potentially affected by the projects. We consider that the User Group could be invited to scrutinise the costs of proposals on a timetable that fits with project development rather than the business plan cycle.

**ETQ47. Do you agree with our proposals to modify the implementation process by which funding requests for mitigation projects are submitted and approved?**

We welcome a proportionate approach to consideration of the low-cost solutions to landscape enhancement in the LEI. We understand that this revised process will retain important elements of independent review while providing applicants with a more streamlined process. To date, the expenditure scrutiny process has caused delays and uncertainty in the timetable for the scheme's funding windows, making it difficult to establish a good level of volunteer support and involvement. Annual reporting on project delivery and expenditure based on an expenditure cap would seem a more practical and proportionate approach.

We agree that retaining the scope of the scheme in National Parks, AONBs and National Scenic Areas is appropriate because it reflects the legislative duties of Ofgem and the TOs and provides the opportunity for the largest benefits in landscape impact. It is also fitting that schemes in these designated areas, which are landscapes of importance to (and managed for) everyone, should have financial support based on the willingness to pay of national consumers. The positive impacts of visual improvements in our protected landscapes will be felt by visitors from all over the country as well as the consumers who are resident there.

**ETQ48. We welcome stakeholders' views on any other considerations they think are relevant to policy development for visual amenity issues in RIIO-ET2.**

There is still much to do reducing landscape impacts from infrastructure in National Parks and AONBs. Notwithstanding this and our comments in question ETQ47, we consider that Ofgem should look at ways in which the learning from the VIP and LEI projects could benefit landscapes which are not currently protected. It is our view that that this falls outside the scope of the VIP/LEI; however, landscapes which are considered more 'ordinary' often do not attract the same level of funding for landscape, environmental or public access provision. As they are not subject to the same planning protections, they may suffer a deterioration of landscape quality over time which takes them further from the prospect of attracting funding for landscape enhancement. However, these are landscapes in which many consumers live, work and spend their leisure time.

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