



Sedgemoor
IN SOMERSET



**Somerset West
and Taunton**



STRATEGIC DIRECTOR

Doug Bamsey

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22 November 2019



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James Norman - Head of New Transmission Investment
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Dear James

Hinkley-Seabank – OFGEM Consultation on Assessment of Capital Costs for the Hinkley - Seabank Electricity Transmission Project

The Joint Councils (South Gloucestershire, Bristol City, North Somerset, Somerset, Sedgemoor and Somerset West and Taunton) have been working together on the Hinkley C Connection Project (HCCP) through pre-application, examination by the Planning Inspectorate and now implementation. Throughout we have worked closely with our communities and with National Grid.

We, therefore, have an extensive knowledge and understanding of the project, most particularly the impact on our areas and communities.

Whilst the Joint Councils do not intend to comment on the cost analysis to be considered by National Grid, the Joint Councils do wish to comment on Question 1 in respect of Ofgem's initial views in relation to National Grid's approach to proposing T -pylons in its planning application.

The views set out below represent the views of the lead officers within those Councils.

1) The Joint Councils do not agree with the initial views set out by Ofgem in relation to National Grid's approach to proposing T-Pylons in its planning application.

Our understanding is that National Grid's approach to using T pylons would have been developed taking into account all relevant and material factors as prescribed in the Planning Act, of which, the relevant National Policy Statement requires consideration of potential costs and benefits of feasible means of connection. In addition, we must emphasise that the design of the proposal was influenced by comments from interested parties (including local communities) during the lengthy pre-application stage and public examination.

Whilst your comments at paragraph 2.6 of the consultation are noted in respect of roles and responsibilities, we would like to take the opportunity to comment on your reflections of T-Pylon



locations outside of the AONB. Whilst we are unable to comment on the cost benefit analysis undertaken by National Grid, hopefully we can assist in explaining our assessment of landscape value. It must be noted that the Examining Authority gave lengthy consideration to each project section and value ratings and whether/how specific locations required certain mitigation.

Landscape value should not be wholly based on landscape designations. In our assessment of the application in respect of landscape and visual impacts, we took into account and included in our representations reference to the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3). This document provides guidance that where there are no landscape designations, judgements should be based on criteria that can be used to establish landscape value (paragraph 5.45). The GLVIA3 also provides another geographical level of value, the community level (paragraphs 2.11-2.12). The same paragraph also states that there should be no over-reliance on designations as a sole indicator of value. Assessments of the value of a landscape normally make judgements not only on the geographical extent (or the relative number of people that might value that landscape, but also give a measure or degree of that value (i.e. high, medium or low) with criteria for each category.

In our view, the scheme included T-pylons as a fundamental part of the mitigation for this project as it crosses what was concluded as a sensitive landscape.

The Joint Councils would welcome the opportunity to meet with OFGEM to explain our thinking in more detail or to answer any questions you may have.

Yours sincerely for the Joint Councils;

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