

# VISUAL IMPACT PROVISION

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How we intend to reduce the  
visual impact of existing electricity  
transmission lines in National Parks and  
Areas of Outstanding Natural Beauty

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nationalgrid



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# 01: Introduction

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National Grid is funded by a price control mechanism which is agreed with and set by Ofgem, the electricity and gas markets regulator. Ofgem and National Grid have agreed a set of price controls and incentives for the period from April 2013 to March 2021.

The price controls and incentives include a provision of £500 million for electricity transmission owners to mitigate the visual impact of existing electricity infrastructure in nationally protected landscapes in Great Britain. For National Grid, which is the electricity transmission owner in England and Wales, this means considering the visual amenity of our existing infrastructure in National Parks and Areas of Outstanding Natural Beauty (AONBs). We call this the ‘Visual Impact Provision’.

National Parks and AONBs are nationally important landscapes with statutory protection. At National Grid we are passionate about playing our part in conserving and enhancing the natural beauty, wildlife and cultural heritage of these landscapes. By making use of this fund, we will do as much as we possibly can to conserve and enhance England and Wales’s most valued landscapes.

We want to seize the opportunity the fund creates to work collaboratively with stakeholders to achieve this. We will of course work in accordance with our statutory duties and licence obligations<sup>1</sup> and national planning policy<sup>2</sup>. In particular, we have duties to maintain our network in an economical and efficient way, to preserve amenity, and to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks and AONBs.

This document has been prepared as our Visual Impact Provision policy on how we will use the fund and work with our stakeholders in identifying opportunities for maximising benefits from it. It has been presented to Ofgem for review, following a public consultation on our draft version between July and September 2013.

Our objective is to achieve the maximum enhancement to the landscape from the available funds whilst ensuring that no significant adverse impacts arise as a result.

This policy document sets out our approach to achieving our objectives, including the identification of a set of guiding principles, the creation of a Stakeholder Advisory Group consisting of stakeholders with national remits for England and Wales, and ways of engaging other stakeholders. We are committed to using the Visual Impact Provision in a collaborative and transparent way.

<sup>1</sup> Section 11A(2) of the National Parks and Access to the Countryside Act 1949; Section 85 of the Countryside and Rights of Way Act 2000. We have summarised our duties on our VIP website [www.nationalgrid.com/VIP](http://www.nationalgrid.com/VIP)

<sup>2</sup> Para. 115 and Para. 116 of the National Planning Policy Framework (2012); Paras. 5.3.6 and 5.3.7 of Planning Policy Wales (Edition 9, November 2016); Paras. 5.9.9-5.9.13 of Overarching National Policy Statement for Energy (EN-1) (2011); Para. 2.2.6 of National Policy Statement for Electricity Networks Infrastructure (EN-5) (2011)

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## 02: What can the Visual Impact Provision be used for?

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**National Grid's Visual Impact Provision applies to existing electricity infrastructure in designated National Parks and AONBs in England and Wales. This infrastructure mainly comprises our existing high voltage (400,000 and 275,000 Volt) overhead electricity transmission lines.**

**The Visual Impact Provision can, where justified in relation to the relevant special licence condition, also apply to lines adjacent to protected landscapes<sup>3</sup>, where an effect can be shown to their setting.**

**Examples of how the fund could be used are:**

- landscaping enhancements
- screening substations or overhead lines from key public viewpoints
- use of alternative pylon designs, such as the T-pylon<sup>4</sup>
- re-routeing or rationalising existing lines
- whole or partial replacement of existing overhead lines with underground cables
- innovative ways of painting pylons to reduce their visual impact
- initiatives in National Park and AONB management plans, where these can be clearly shown to directly meet the purpose of using Visual Impact Provision to mitigate the visual impact of our electricity infrastructure
- other visual impact measures recommended by stakeholders

The research<sup>5</sup> we have conducted to establish the 'willingness to pay' of consumers indicates that the majority of consumers favour 'undergrounding', followed by screening with trees, the 'T-pylon' and re-routeing. We therefore anticipate that a significant portion of the funds will be used for placing existing lines, or parts of them, underground. We also consider it would be advantageous to deliver cheaper and simpler

'quick wins' such as localised screening, which can be delivered over a shorter period of time, as well as more major undergrounding projects. The final proposals put forward for funding will be informed by our engagement with stakeholders.

**The Visual Impact Provision does not apply to:**

- the construction of new transmission lines and other new transmission infrastructure. The visual impact of these is addressed through the planning and consent process before the infrastructure is constructed
- other infrastructure operated by National Grid, such as our gas transmission and distribution networks
- other landscape, heritage and ecological designations – such as World Heritage Sites, Heritage Coasts, conservation areas, scheduled monuments, Sites of Special Scientific Interest, Special Areas for Conservation – although these are likely to be factors for consideration where they are located within or adjacent to a National Park or AONB
- infrastructure owned and operated by other businesses (e.g. lower voltage lines, typically carried on smaller pylons or wooden poles, used for electricity distribution)
- areas which are not yet designated as National Parks or AONBs. However, as and when new areas are designated, lines within them will be eligible for consideration under the Visual Impact Provision

Where replacement or maintenance activity is planned on a line, the allowance will not be used to pay for this. However when estimating the costs for mitigation options, consideration will be given to possible cost savings resulting from co-ordination with planned works (e.g. other works in the vicinity of potential enhancement proposals; planned maintenance to the candidate line which would otherwise be carried out).

<sup>3</sup> Electricity Transmission and National Grid Gas: Outputs, incentives and innovation Supporting Document Para. 2.103 <https://www.ofgem.gov.uk/ofgem-publications/53600/2riot1foutputsincentivesdec12.pdf>

<sup>4</sup> The winner of the 2011 Pylon Design Competition organised by the Royal Institute of British Architects (RIBA) the Department of Energy and Climate Change (DECC) and National Grid

<sup>5</sup> See Consumer Willingness to Pay research, National Grid Electricity Transmission (June 2012) (Para. 34) [www.nationalgrid.com/NR/rdonlyres/88431596-2009-4CDE-BE51-EC5E536FF2BC/55358/NationalGridWTPreport.pdf](http://www.nationalgrid.com/NR/rdonlyres/88431596-2009-4CDE-BE51-EC5E536FF2BC/55358/NationalGridWTPreport.pdf)

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We are committed to using the Visual Impact Provision in a collaborative and transparent way

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## 03: How we will use the Visual Impact Provision

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**We will use the Visual Impact Provision to mitigate the visual impact of our electricity transmission infrastructure in the most precious landscapes. Our objective in using the allowance will therefore be to achieve the maximum enhancement to the landscape in England and Wales from the available funds whilst ensuring that no significant adverse impacts arise as a result.**

National Grid will contribute technical appraisals to refine those priorities. We will ensure that the opinions of local stakeholders are fed into the process. It is envisaged that detailed proposals will then emerge, as technical, cost and environmental factors are assessed.

In this way, we will ensure that stakeholders have a substantial input in determining how the Visual Impact Provision should be used and how National Grid takes forward proposals. We anticipate that a substantial proportion of the engagement activities will occur nearer to the start of the process, to ensure that stakeholder views are taken into account at the earliest stage and we have the best chance of using the Visual Impact Provision effectively.

### **Landscape Assessment Methodology**

Alongside this policy, we have published a Landscape and Visual Impact Assessment methodology<sup>7</sup> which, in consultation with stakeholders, we propose to use as the basis for prioritising landscape impacts. We expect this methodology to develop and evolve, through stakeholder input, as the project progresses.

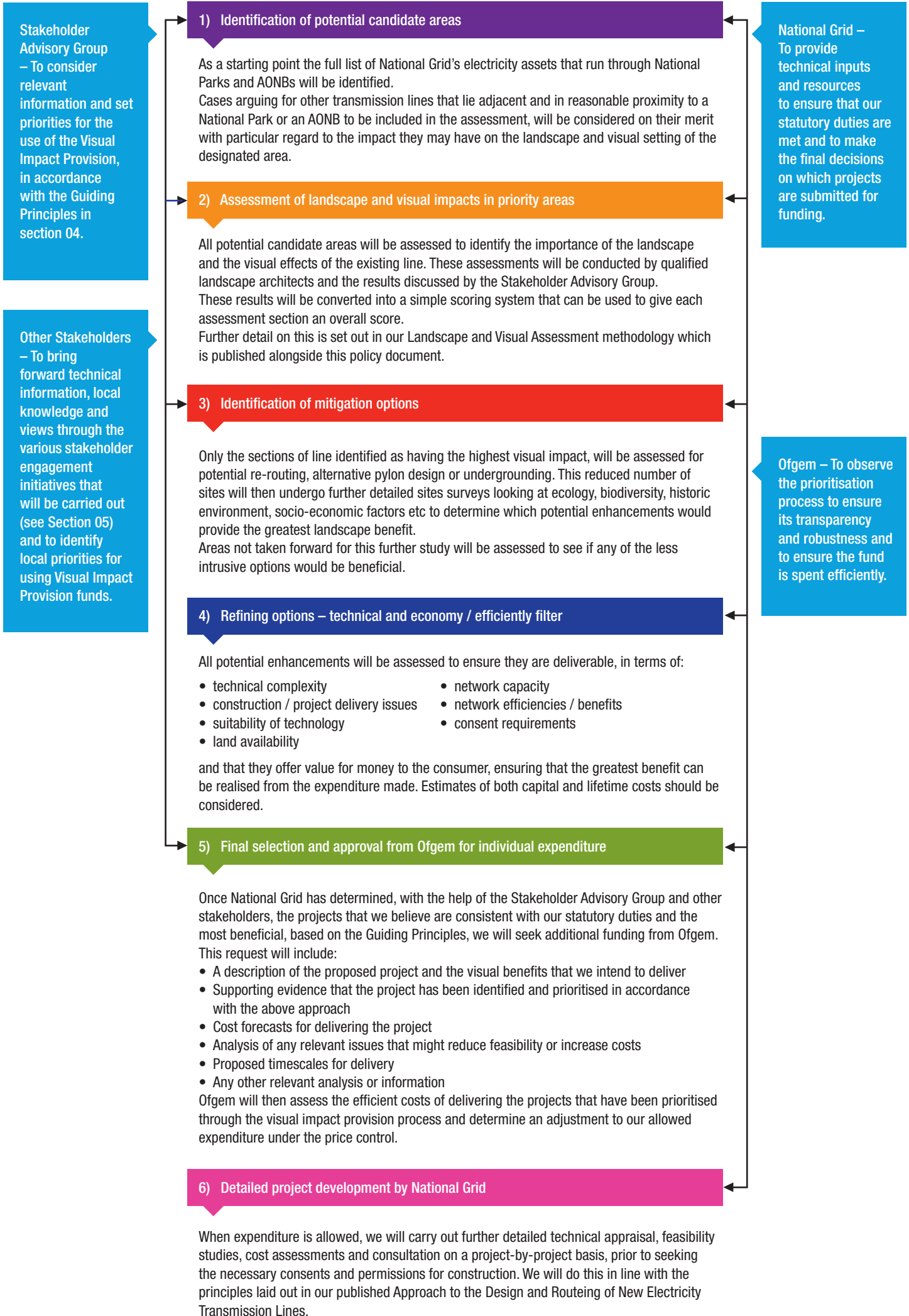
### **Our Plan**

The process on the next page shows how we will identify the projects to take forward as candidates for funding. Section 04 sets out the Guiding Principles and explains in further detail how we will engage with our stakeholders to help us decide how to use the Visual Impact Provision.

To deliver cheaper and simpler ‘quick win’ projects, such as localised screening, we have launched the Landscape Enhancement Initiative. We have published an annex to this policy, which has been reviewed by Ofgem that explains how this initiative will work<sup>6</sup>.

<sup>6</sup> Annex to VIP Policy: Landscape Enhancement Initiative <http://lei.nationalgrid.com/media/1100/lei-policy-doc.pdf>

<sup>7</sup> The Landscape and Visual Impact Assessment Methodology is based on the framework set out in Guidelines for Landscape and Visual Impact Assessment (GLVIA) (3rd Edition) (2013) published by Routledge on behalf of the Landscape Institute and the Institute of Environmental Management and Assessment. A copy of our methodology can be found on our VIP website [www.nationalgrid.com/VIP](http://www.nationalgrid.com/VIP)



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## 04: The Guiding Principles

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**We will work with stakeholders to decide how to treat existing National Grid electricity infrastructure to bring the most benefit from the Visual Impact Provision. Candidate schemes will be selected with reference to the Guiding Principles below.**

### **Guiding Principles**

Working with stakeholders, we will prioritise proposals which:

- result in **greatest landscape** enhancement benefits
- result in greatest opportunities to conserve and enhance **natural beauty, wildlife and cultural heritage** whilst avoiding unacceptable impacts on the natural and historic environment
- result in greatest opportunities to encourage **public understanding and enjoyment of the protected landscapes**, including positive socio-economic impacts
- are **technically feasible** in context of the wider transmission system
- are **economical and efficient**

As these principles may sometimes conflict with one another and each scheme is likely to perform differently against them, we will need to carefully balance the choices we make, with the help of stakeholders, against the Guiding Principles.

“ Potential enhancements should not result in any other significant adverse impacts on other landscape or environmental features ”





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## 05: Engagement with stakeholders

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We believe that the views of our stakeholders and consumers will be vital in making decisions on how we should use the Visual Impact Provision to maximise enhancement to the landscape from the available funds.

Our engagement will be consistent with our wider stakeholder engagement principles which we developed as part of our RIIO price control consultation<sup>8</sup>. We will carry out all engagement activities on the Visual Impact Provision in accordance with the following principles by:

- engaging widely, effectively and at a formative stage in establishing priorities
- being open with information and transparent about the judgements we make
- developing proposals that deliver what society needs from us

In developing the policy set out in this document we have taken account of:

- engagement with stakeholders through the RIIO 'Talking Networks' programme of events
- feedback to Ofgem's RIIO Initial Proposals in July 2012<sup>9</sup>
- the results of a public consultation on a draft of this document which ran between 30th July to 24th September 2013

We are keen that stakeholders play a key role in helping us to identify those areas and lines which would benefit most from expenditure under the Visual Impact Provision. There are two main ways we will do this: we will form a Stakeholder Advisory Group; and seek the views of other stakeholders.

### **Stakeholder Advisory Group**

We will invite a group of stakeholders, with national remits for England and Wales, to join us as a Stakeholder Advisory Group, under an independent chair, to help us to:

- identify initial priorities for the use of the Visual Impact Provision, based on the guiding principles set out above
- consider the technical inputs and evidence provided by National Grid
- consider the input of wider stakeholders who are not directly represented on the Stakeholder Advisory Group (e.g. specific comments on where use of Visual Impact Provision funds might be beneficial, or where there is evidence of public support)
- identify the specific infrastructure and locations which would most benefit
- define the projects which should be taken to development phase by National Grid
- re-consider or re-assess priorities and use of the fund, as development of projects progresses

<sup>8</sup> [https://www.nationalgrid.com/sites/default/files/documents/National%20Grid\\_s%20commitments%20when%20undertaking%20works%20in%20the%20UK.pdf](https://www.nationalgrid.com/sites/default/files/documents/National%20Grid_s%20commitments%20when%20undertaking%20works%20in%20the%20UK.pdf)

<sup>9</sup> <http://www.nationalgrid.com/NR/rdonlyres/D4620976-E1B1-4BD2-9551-CB5D7AAD528D/55678/TalkingNetworksWorkshop8thAugust2012report.pdf>

The organisations we have invited as members of this group are:

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|--|--|
| <p>National Association for Areas of Outstanding Natural Beauty<br/>National Parks England<br/>National Parks Wales</p>  | <p>Representing the 7 National Parks and 19 AONBs in which we have lines</p>   |
| <p>Cadw<br/>Historic England<br/>Natural England<br/>Natural Resources Wales</p>   | <p>Statutory bodies with relevant responsibilities and technical expertise</p>   |
| <p>Campaign for National Parks<br/>Campaign to Protect Rural England<br/>Campaign for the Protection of Rural Wales<br/>The Landscape Institute<br/>National Trust<br/>The Ramblers<br/>VisitEngland<br/>Visit Wales</p> | <p>Organisations with an interest in protected landscapes and rural areas and their use</p>                                      |
| <p>National Grid</p>   | <p>To provide technical input, ensure our statutory duties are met, and decide which schemes should be submitted for funding</p> |
| <p>Ofgem, the energy regulator</p>   | <p>To observe the process and make the final decisions on expenditure</p>  |

### Seeking the views of other stakeholders

We will seek the views of other stakeholders, such as local groups who use National Parks and AONBs, and those who care passionately about them to establish their priorities for using Visual Impact Provision funding. The Stakeholder Advisory Group will help shape and inform how this wider consultation will work.

We will engage with:

- landowner groups and landowners
- affected National Park authorities
- local planning authorities
- AONB conservation boards and management units/partnerships
- amenity societies such as the Friends of individual National Parks and AONBs
- organisations with an interest in the environment (e.g. the Wildlife Trusts, RSPB)
- bodies such as Consumer Futures and the Major Energy Users' Council, which represent electricity consumers
- other electricity transmission and distribution owners
- groups established by the distribution network operators (DNOs) to advise on where DNO lines should be placed underground

The final decision on how to undertake wider consultation will be made in collaboration with the Stakeholder Advisory Group. We expect to proactively reach out to stakeholders, though our website; though one-to-one meetings with representatives of the organisations that represent the interests of groups of stakeholder; and though written consultations.

As clearer priorities emerge and proposed projects are refined, we will engage further with these groups (for example, in the case of new underground cables, establishing acceptable route corridors and alignments) in line with the principles laid out in our published Approach to the Design and Routeing of New Electricity Transmission Lines<sup>10</sup>. At this point we will carry out project-specific consultation before seeking to secure the necessary planning permissions and consents.

Project information, updates and documentation will be shared through our dedicated website.

<sup>10</sup> <https://www.nationalgrid.com/sites/default/files/documents/13794-Our%20approach%20to%20the%20design%20and%20routeing%20of%20electricity%20transmission%20lines.pdf>



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## 06: Working with other transmission and distribution owners

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### **The Scottish transmission system**

National Grid owns and operates the high voltage electricity transmission network in England and Wales. The £500m allowance applies to the whole of Great Britain, and can therefore also be used for the Scottish transmission network.

We will engage with Scottish Hydro Electric Transmission Limited and Scottish Power Transmission Limited, which between them own the Scottish transmission network, to try to ensure that between us we can maximise the benefits of the allowance to consumers across England, Wales and Scotland.

In particular, we will engage with the Scottish transmission owners to share best practice and knowledge with each other in relation to the implementation of the Visual Impact Provision and to share with them relevant information, technical assessments and outputs from our process of identifying and taking forward priorities.

### **Local distribution network operators**

The Visual Impact Provision does not apply to electricity distribution infrastructure operated by local distribution network operator (DNO) companies, as these organisations have separate allowances available for placing existing lines underground.

There may be cases where a collaborative approach to using both funds can result in greater benefits – for example, where a ‘wirescape’ of both our lines and those of DNOs exist. In such situations, we will work with the DNOs to ensure maximum benefit from the use of both funds. In particular, where they exist, we will engage with the groups established by the DNOs to advise on where DNO lines should be placed underground.



**It is important that any expenditure we make under the Visual Impact Provision is made in accordance with our statutory duties**



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## 07: Review of this document

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We reviewed this Policy in 2017 (half way through the price control period). We consulted stakeholders and revised the Policy as necessary to ensure that it remains fit for purpose<sup>11</sup>. If required by the emergence of new best practice or any other relevant development, we may make interim amendments. In particular, we may review our Policy in the light of:

- changes to our responsibilities, legislation, government policy or guidance
- changes in best practice guidance in environmental, social or economic appraisal
- relevant technology advances
- new information about the application or costs of different technologies
- feedback from the Stakeholder Advisory Group

We will seek to record learning and best practice from the process to apply to similar or related stakeholder engagement initiatives in the future.



<sup>11</sup> Details of the policy review and revisions made to the policy are on our VIP website <https://www.nationalgrid.com/uk/investment-and-innovation/environment-and-community/visual-impact-provision-vip>

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## 08: Contacts

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Visual Impact Provision hotline: **0330 134 0051**

Visit our website at: **[www.nationalgrid.com/VIP](http://www.nationalgrid.com/VIP)**

Send an email to: **[visualimpact@nationalgrid.com](mailto:visualimpact@nationalgrid.com)**

Write to our freepost address at:  
**FREEPOST VISUAL IMPACT PROVISION**







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