

Ofgem consultation: Extending competition in electricity transmission: arrangements to introduce onshore tenders

Response of the Landscape Institute, 11 January 2016

The Landscape Institute

The Landscape Institute (LI) is the Royal Chartered body for the landscape profession. In accordance with our Royal Charter, the LI is concerned with:

“...all aspects of the science, planning, design, implementation and management of landscapes and their environment in urban and rural areas and the assessment, conservation, development, creation and sustainability of landscapes with a view to promoting landscapes which are aesthetically pleasing, functional and ecologically and biologically healthy and which when required are able to accommodate the built environment in all its forms”

As a professional organisation and educational charity, we work to protect, conserve and enhance the built and natural environment for the public benefit. The LI represents 5000 landscape architects, planners, designers, managers and scientists. We champion multifunctional and sustainable landscapes in both town and country. We believe that through careful and appropriate planning, design and management, it is possible to deliver a wide range of environmental, social and economic benefits.

Response to the consultation

Our response is submitted via this statement rather than responses to each of the consultation questions because it has not been possible to identify opportunities within the consultation document to provide feedback detailing our primary concerns with the proposals.

Over the years, National Grid, the current Transmission Owner, has begun to develop an positive understanding of how planning and design of transmission infrastructure should safeguard landscape values, minimise harm to landscape character, and take account of people’s visual amenity. Recently, Ofgem has approved the *Visual Impact Provision* (recipient of a 2015 Landscape Institute Award¹) of £0.5bn in the current control period, for the purpose of addressing and ameliorating the adverse effects of existing transmission infrastructure in National Parks and Areas of Outstanding Natural Beauty (AONBs). It would be a shame to lose this evolving respect for the finite resource of public interest that is the landscape because of a narrow focus on commercial values and the LI is concerned that a competitive process could result in degradation of the landscape.

We fully appreciate that the proposals may well deliver financial benefits for consumers through the introduction of competitive tendering in onshore electricity transmission. However the consultation is lacking in that there does not appear to have been any consideration of the impacts of introducing competition – presumably a process based on price – on visual amenity and wider environmental quality. Tender requirements should not be entirely focussed on the commercial criteria. We urge

¹ <http://www.landscapeinstitute.org/casestudies/casestudy.php?id=482>

that the tendering procedures should safeguard landscape interests as the impacts of transmission infrastructure will be felt far and wide for many year to come. Subsequent work undertaken by Ofgem to refine the proposals must take this concern into account.

In addition to the above, the LI is also concerned that there may be negative consequences arising from the preferred 'late' CATO model. The System Operator, being responsible for consenting work, will have developed relationships with local communities, landowners and stakeholders which are at risk from a potential lack of continuity once a CATO is appointed to build and operate electricity transmission infrastructure. Safeguards need to be introduced which will ensure consent work undertaken by one body is not undermined by construction / operation carried out by another.

It is worth reminding Ofgem that the UK is a signatory of the European Landscape Convention (ELC)². The ELC provides a people-centred and forward-looking way to reconcile environmental management with the socio-economic challenges of the 21st century and to help people and communities to re-connect with place. The treaty requires signatory states to, among other things:

"...integrate landscape into its regional and town planning policies and in its cultural, environmental, agricultural, social and economic policies, as well as in any other policies with possible direct or indirect impact on landscape."

Ofgem must ensure that the proposals set out in the consultation and those that are ultimately adopted do not run counter to all relevant articles of the ELC, article 5 in particular. More information on these can be found in the link at footnote 2.

The LI urges that the tender requirements should include consideration of the effects of large transmission infrastructure proposals at every stage and from the earliest point in the planning, design and consenting process and would be pleased to engage with Ofgem to draw up suitable terms of reference if this would be of value.

The LI would like to thank Ofgem for the opportunity to respond to this important consultation. For further information please contact Stephen Russell, Head of Policy, at stephen.russell@landscapeinstitute.org or on 020 7685 2649.

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/236096/8413.pdf