

National Grid TPCR5 Preliminary Stakeholder Consultation

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1. Please answer as many of the following questions as you wish. Your views on any or all of these will be a huge help as we shape our forthcoming consultation. The Transmission Price Control Review Question 1 Before reading the Preliminary Stakeholder Consultation document or visiting our website, were you aware of price controls? If so, what is your understanding of them and what do they mean to you?

CPRE has some awareness of price controls. Our understanding of them is that they regulate the amount of investment that gas and electricity utilities can make in their networks. A number of our local groups have worked closely with Ofgem and the industry on both transmission and distribution price control reviews in recent years. We see them as an important means of ensuring that environmental considerations, particularly the impact of the networks on the rural landscape, are given weight in investment decisions. We also support increased investment to facilitate the connection of new renewable energy generating stations.

2. Who should we talk to? Question 2a Whose views do you think we should seek as part of our Transmission Price Control Review stakeholder consultation? Please list all the organisations, types of organisations and individuals you think we should contact.

The list of people to contact provided in the document looks comprehensive and we have no further comment on it.

3. Below is a list of stakeholder groups we think we should talk to as part of the consultation. Question 2b Which groups on this list, if any, do you think we do not need to talk to in the course of this consultation? Please tick all that apply and give reasons in each case.

4. Please enter your reasons below:

The list of people to contact provided in the document looks comprehensive and we have no further comment on it.

5. How should we consult our stakeholders? Question 3a What methods and tools would you expect us to use in order to engage stakeholders in this consultation?

The methods listed can all play a valuable role in engaging stakeholders. It is important that a range of alternative options for future investment are provided in the consultation material, and views openly sought on them, so that consultees can feel that their engagement is being valued. There are important lessons to learn from National Grid's consultations on new electricity transmission schemes it is currently promoting in Somerset and Suffolk. Local CPRE groups and a number of other members of the public have raised concerns with us about the quality of consultation, in particular the range of options offered for new development.

6. Below is a list of methods and tools we are considering using as part of the consultation this winter. Question 3b Which of these methods and tools, if any, do you

think we should definitely not use for this consultation? Please tick all that apply and give reasons in each case.

7. Please enter your reasons below:

All the methods listed can be useful to varying degrees.

8. What should we be talking to our stakeholders about? Question 4a What themes would you expect the stakeholder consultation to cover? Please outline why you think each is important.

CPRE is primarily interested in the environmental impact of National Grid's business and facilitating the development of a low carbon economy. For reasons given below, we think it vital that environmental issues are considered in this consultation, and suggest three questions that National Grid could usefully ask. We have no comment on whether any suggested themes should be removed. CPRE would expect National Grid to seek views, in this consultation, on the overall future development of the network, the level of new development needed and where it should take place. We are concerned that the current Transmission Price Control Review did not take the opportunity to strategically address the visual impact of the electricity network at the same time as accommodating any necessary future new development. The issue has become much more urgent with wider Government and industry plans to invest in new and enlarged energy generating capacity. The Electricity Networks Strategy Group (ENSG), referenced in the document, called in 2009 for £4.7 billion of new investment in electricity networks over the period to 2020. We support the need for more investment in the electricity transmission network. But it is crucial that such investment takes place in a way that recognises the high level of public concern to protect the beauty and tranquillity of our countryside, and the damaging impact that overhead transmission lines have on these qualities. National Grid has undertaken, in the Holford and Horlock Rules, to avoid areas of the highest amenity value when siting new lines. Many of the new schemes proposed by ENSG would directly contravene the two sets of Rules if they are carried on overhead lines. There needs to be an open debate, therefore, about whether such investment, and what it is planned to cover, is appropriate. If such new development is to take place, significant additional upfront investment will be needed to ensure that National Grid meets its environmental commitments. CPRE also requests that National Grid asks for views on whether and how to reduce the visual impact of the current as well as proposed electricity network, particularly as around 10% of it crosses areas of the highest amenity value. There is a particular issue with the lines from Dungeness to Exeter, which crosses land which has recently been designated as the South Downs National Park, as well as other lines in the Peak District and Snowdonia. Setting aside investment to reduce the impact of these lines on the landscape would bring the transmission network in line with the distribution network, where the most recent Distribution Price Control Review has led to 78 miles of overhead line being undergrounded in National Parks and Areas of Outstanding Natural Beauty. CPRE also requests that National Grid asks for views on its role in facilitating the development of renewable energy and a transnational 'supergrid'. Much of the investment recommended by ENSG is predicated on connecting new renewable generating stations. Future investment decisions on the transmission network are likely to need to consider linking National Grid's network to others in Europe as well as addressing issues including the intermittency in supply of important renewable technologies, and how this can be ameliorated through innovations in areas such as energy storage.

9. We think our consultation should cover the impact of our Transmission operations on the following six themes: the SAFETY of the public and our employees and contractors the RELIABILITY of the energy we deliver the ENVIRONMENTAL impact of our business and facilitating the development of a low carbon economy how we CONNECT CUSTOMERS to our Transmission systems how we maintain and improve CUSTOMER SATISFACTION our role in MARKET FACILITATION Question 4b Having now seen our suggested list of themes, what further themes, if any, should we include in our consultation? Please outline why you think each is important.

The list of schemes provided covers CPRE's areas of interest.

10. Question 4c Which themes on our list, if any, should be excluded from the consultation? Please tick all that apply and give reasons in each case.

11. Please enter your reasons below:

For reasons given in answer to 4a, we think it vital that environmental issues are considered in this consultation, and suggest three questions that National Grid could usefully ask. We have no comment on whether any suggested themes should be removed.

12. Question 4d What questions would you expect us to ask in our consultation under each of these themes? Please outline why you think each is important. Question 4d(i) Firstly, what questions would you expect us to ask on Safety? Please include your reasons.

Safety questions are outside CPRE's remit, therefore we have no further comment to make.

13. Question 4d(ii) What questions would you expect us to ask on Reliability? Please include your reasons.

This is outside CPRE's area of expertise.

14. Question 4d(iii) What questions would you expect us to ask on the Environmental impact of our business? Please include your reasons.

CPRE would expect National Grid to seek views, in this consultation, on the overall future development of the network, the level of new development needed and where it should take place. We are concerned that the current Transmission Price Control Review did not take the opportunity to strategically address the visual impact of the electricity network at the same time as accommodating any necessary future new development. The issue has become much more urgent with wider Government and industry plans to invest in new and enlarged energy generating capacity. The Electricity Networks Strategy Group (ENSG), referenced in the document, called in 2009 for £4.7 billion of new investment in electricity networks over the period to 2020. We support the need for more investment in the electricity transmission network. But it is crucial that such investment takes place in a way that recognises the high level of public concern to protect the beauty and tranquillity of our countryside, and the damaging impact that overhead transmission lines have on these qualities. National Grid has undertaken, in the Holford and Horlock Rules, to avoid areas of the highest amenity value when siting new lines. Many of the new schemes proposed by ENSG would directly contravene the two sets of Rules if they are carried on overhead lines. There needs to be an open debate, therefore, about whether such investment, and what it is planned to cover, is appropriate. If such new development is to take place, significant additional upfront investment will be needed to ensure that National Grid meets its environmental commitments. CPRE also requests that National Grid asks for views on whether and how to reduce the visual impact of the current as well as proposed electricity network, particularly as around 10% of it crosses areas of the highest amenity value. There is a particular issue with the lines from Dungeness to Exeter, which crosses land which has recently been designated as the South Downs National Park, as well as other lines in the Peak District and Snowdonia. Setting aside investment to reduce the impact of these lines on the landscape would bring the transmission network in line with the distribution network, where the most recent Distribution Price Control Review has led to 78 miles of overhead line being undergrounded in National Parks and Areas of Outstanding Natural Beauty. CPRE also requests that National Grid asks for views on its role in facilitating the development of renewable energy and a transnational 'supergrid'. Much of the investment recommended by ENSG is predicated on connecting new renewable generating stations. Future investment decisions on the transmission network are likely to need to consider linking National Grid's network to others in Europe as well as addressing issues including the intermittency in supply of important renewable technologies, and how this can be ameliorated through innovations in areas such as energy storage.

15. Question 4d(iv) What questions would you expect us to ask on how we Connect Customers? Please include your reasons.

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16. Question 4d(v) What questions would you expect us to ask on Customer Satisfaction? Please include your reasons.

No comment.

17. Question 4d(vi) What questions would you expect us to ask on our role in Market Facilitation? Please include your reasons.

No comment.

18. When should we consult? Question 5 Below is a proposed timeline, with the stakeholder consultation planned to take place between November 2010 and February 2011. Do you think the proposed timeline should be changed in any way? If so, please give reasons for each suggested change.

No comment.

Image

19. Any other comments? Question 6 Please let us know if you have any other thoughts or comments on the points raised in the Preliminary Stakeholder Consultation document or in this survey, or if you would like to highlight any other issues you consider to be important.

No further comments to make.

20. Thank you for your responses. Please enter your name and (if applicable) the name of the organisation you are representing.

Name (optional)

Paul Miner

Organisation (optional)

Campaign to Protect Rural England (CPRE)

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