

### **Changing the VIEW**

Reducing the visual impact of existing electricity transmission infrastructure in Scotland's National Parks & National Scenic Areas.





SP Energy Networks (SPEN) Changing the Visual Impact of Existing Wirescape (VIEW) Project represents an opportunity to contribute to the success of Scotland's National Parks and National Scenic Areas by accessing a share of a £500 million OFGEM fund available to UK transmission operators which is intended to mitigate or positively enhance the visual impact of pre-existing transmission infrastructure within the UK's most protected and highly valued landscapes.

Changing the VIEW will identify potential mitigation proposals for overhead electricity transmission lines, or associated transmission infrastructure which is in the ownership of SPEN and within reasonable proximity to Scotland's highly valued and most sensitive landscapes - National Parks and National Scenic Areas (NSAs).

In identifying and addressing the sections of infrastructure that have the most adverse impact on the landscape, visual amenity, and special qualities of these designated landscapes, SPEN will seek to work collaboratively with a range of stakeholders and end users, to adopt a partnership approach to deliver the best possible outcome for the areas in which they operate.



#### Purpose

This document aims to set out the SPEN approach to Changing the VIEW, how appropriate mitigation projects will be identified, how proposals will be developed in partnership with a range of stakeholders, how VIEW will be presented and how it will ensure transparency and best value.

This document sets out the key objectives of the Changing the VIEW Project and how these will be achieved; it also sets out the approach to identifying appropriate members of the Stakeholder Partnership Group; describes the process of engagement and sets out the key selection criteria which will steer the identification and selection of suitable mitigation proposals/projects.

#### **Fact Box: Regulation**

All electricity transmission owners are funded by a price control mechanism which is agreed with and set by OFGEM. OFGEM and SPEN have agreed a new set of price controls and incentives for the period from April 2013 to March 2021. As part of this current transmission price control, RIIO-T1, OFGEM introduced a policy that would allow the electricity transmission owners to reduce the visual impact of existing transmission infrastructure in National Parks and Areas of Outstanding Natural Beauty (AONBs) in England and Wales, and National Parks and NSAs in Scotland

Under this initiative, a transmission owner can ask for funding for projects to mitigate the visual impact of transmission infrastructure in protected areas. However, before a transmission owner can ask OFGEM to approve funding for a specific project, it must have an agreed approach on how it will work with stakeholders to identify and prioritise projects that could yield the greatest visual improvements.

## Why is Changing the VIEW Important?

Electricity is an essential part of our everyday lives. We all expect to have access to its benefits at the flick of a switch and we take its presence in our homes and workplaces for granted.

SPEN is responsible for ensuring that electricity supplies are provided at the point of usage and this is achieved through a series of Transmission and Distribution networks.

High voltage, high capacity overhead lines are the most economic and reliable choice for the bulk transmission of electricity throughout the UK. The routeing of transmission lines is a complex process, requiring a balance to be struck between statutory obligations, need, engineering requirements, economic viability, land use and the environment.

In developing proposals for new transmission lines, SPEN take into account all of these matters to develop the most appropriate transmission solution together with the most appropriate range of mitigation measures possible.

Changing the VIEW provides a unique opportunity to re-examine historic transmission infrastructure within, and in some instances, in close proximity to National Parks and NSAs.

In most cases this infrastructure pre-dates the current designations which cover the land surrounding it, and in most cases that landscape has changed, and people have become accustomed to the presence of such features over time.

VIEW will be undertaken in accordance with SPEN's statutory duties, licence obligations and National Planning Policy. In particular, SPEN has a duty to maintain its network in an economical and efficient way, to preserve amenity, and to conserve and enhance the natural beauty, wildlife and cultural heritage of designated landscapes.

#### Fact Box: SPEN as a Transmission Licence Holder

As a transmission licence holder, SPEN is required under Section 9(2) of the Electricity Act 1989 to:

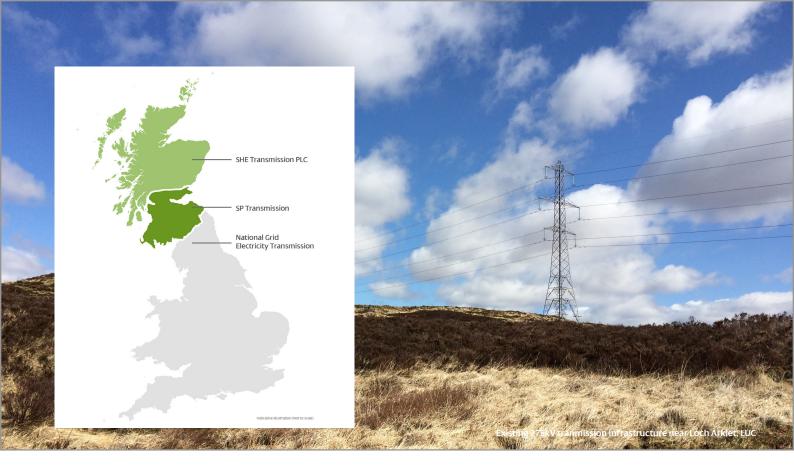
- · develop and maintain an efficient, co-ordinated and economical system of electricity transmission; and
- · facilitate competition in the supply and generation of electricity.

Schedule 9 of the Electricity Act 1989 imposes a further statutory duty on SPEN to take account of the following factors in formulating proposals for the installation of overhead transmission lines:

- '(a) to have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features or special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and,
- (b) to do what it reasonably can to mitigate any effects which the proposals would have on the natural beauty of the countryside or any such flora, fauna, features, sites, buildings or objects.' (Schedule 9. Electricity Act 1989).

In its 'Schedule 9 Statement', SPEN sets out how it will meet the duty placed upon it by legislation. The statement refers to the application of best practice in assessing the environmental impacts of proposals and to identify appropriate mitigation measures.

As a result of these obligations, SPEN is required to identify electrical connections that meet the technical requirements of the electricity network and cause, on balance, the least disturbance to the environment and the people who live, work and enjoy recreation within it. Striking the right balance can be challenging, and in seeking to achieve this, SPEN recognises the importance of consulting effectively on proposals and in being transparent about the decisions that are made. Effective consultation is also promoted within the Schedule 9 Statement.



Changing the VIEW represents an excellent opportunity for SPEN to further engage stakeholders, contribute to the success of Scotland's National Parks and NSAs, and to access a share of the funding allocation which is available. VIEW represents the next stage of SPENS commitment to conserve and enhance the natural beauty, wildlife and cultural heritage of Scotland's landscape.

#### **Fact Box: National Planning Policy**

Scottish Government policy, as set out in National Planning Framework 3 (NPF3), provides a commitment to maintaining and enhancing the electricity transmission network:

'Electricity grid enhancements will facilitate increased renewable electricity generation across Scotland. An updated national development focusing on enhancing the high voltage transmission network supports this, and will help to facilitate offshore renewable energy developments. Distribution Network Operators (DNOs) also have plans to make essential upgrades to the distribution networks. This will be vital, particularly for enabling areas that are remote from the main grid to realise their renewable energy potential. The environmental impacts of this type of infrastructure require careful management.' (NPF3, 2014 – para. 3.28)

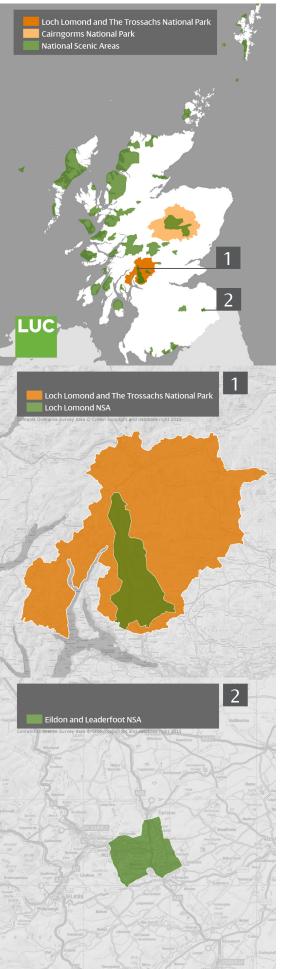
The Scottish Government also outline the importance of ensuring that the landscape and visual impacts of new and upgraded transmission lines are appropriately mitigated, and provide a context for how such mitigation can be provided:

'We recognise that there will be a need to mitigate the environmental impacts of new or upgraded high voltage onshore transmission lines and that there will be a cost associated with this. Mitigation corridors bringing wider benefits to landscape and visual amenity, and which promote green places and active travel networks. may be an effective option in some areas.' (NPF3, 2014 – para, 3,29)

#### Where can the fund be used?



**Changing the VIEW applies** only to pre-existing electricity transmission infrastructure located within National Parks and NSAs in Scotland. In some instances, transmission infrastructure which is seen on the approach to, or from key locations within these nationally designated landscapes, where impacts affect the visual setting or views from the designated area may be considered. In such instances it is expected that the infrastructure would likely be located within approximately 2 km of the boundary of the protected area, although each case will be assessed on its merits.



#### Scotland's most highly valued landscapes

Scotland's nationally protected landscapes comprise two National Parks<sup>1</sup> (Loch Lomond & The Trossachs National Park and the Cairngorms National Park) and 40 National Scenic Areas<sup>11</sup>. These are important nationally designated landscapes of which protection is a statutory requirement. NSAs were designated in 1980 in recognition of their outstanding scenery, and along with Scotland's two National Parks, they represent Scotland's finest landscapes, and are visited by hundreds of thousands of people for their stunning scenery, diverse wildlife and outdoor recreational activities.

The project will focus on mitigation of the impacts of pre-existing transmission infrastructure (132kV, 275kV and 400kV overhead transmission lines, and associated transmission infrastructure) within some of these nationally protected landscapes.

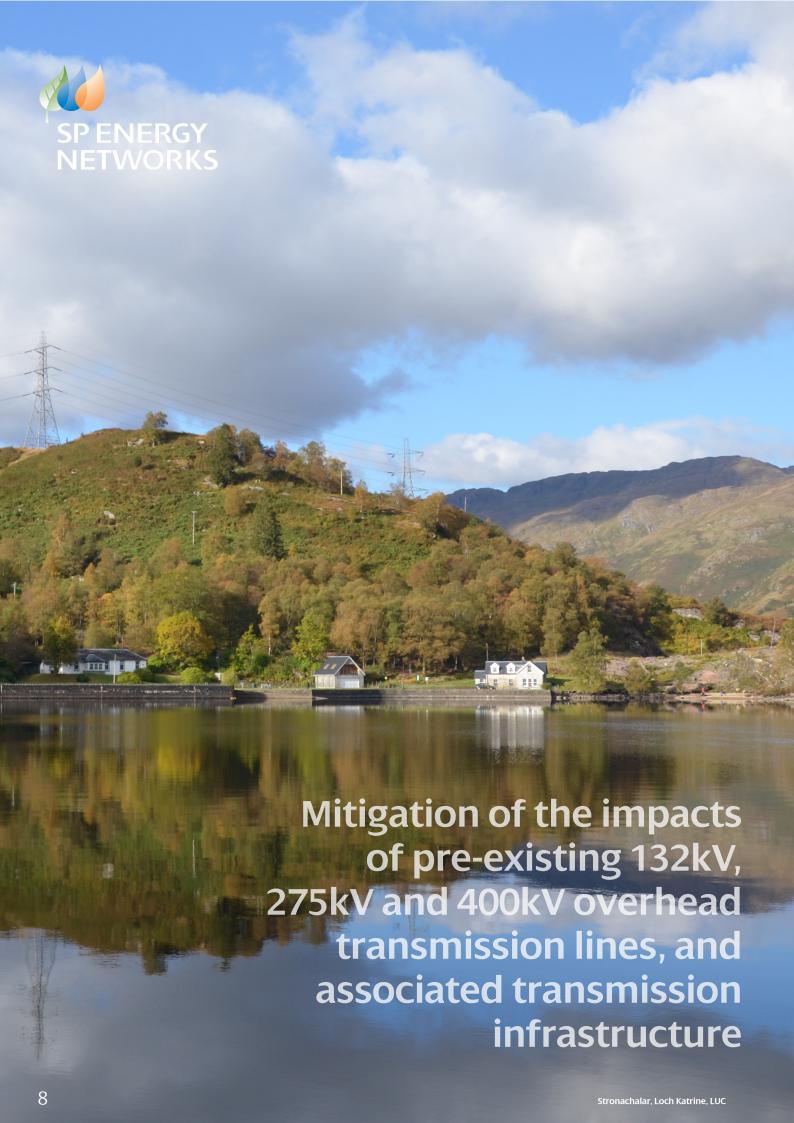
SPEN currently own and operate the electricity transmission infrastructure within central and southern Scotland. This equates to over 4000km of overhead transmission lines, 320km of underground cable and 132 substations. Owing to the SPEN approach to routeing and siting of such infrastructure, and due to a commitment to its responsibilities as a Transmission Licence Holder, the vast majority of this infrastructure does not affect designated areas. However there are cases where existing transmission infrastructure was sited prior to the statutory designation of these landscapes and it is the impact of this current infrastructure that SPEN will investigate, and where possible reduce. SPEN currently maintain in the order of 120 km of overhead line located within National Parks and NSA's in the following locations:

Loch Lomond & The Trossachs National Park

Loch Lomond NSA

Eildon and Leaderfoot NSA.

Changing the VIEW will consider the effects of pre-existing transmission infrastructure on landscape and visual amenity within and in close proximity to Loch Lomond and The Trossachs National Park (encompassing Loch Lomond NSA) and the Eildon and Leaderfoot NSA in the Scottish Borders. SPEN does not own or operate existing grid infrastructure within other National Parks or NSAs in Scotland.



#### What can the fund be used for?

#### The fund may be used for the following purposes:

Landscape enhancements;

The screening of overhead transmission lines or other transmission infrastructure from public viewpoints/routes;

The re-routeing of (sections of, or entire) existing overhead transmission infrastructure;

Replacement of (sections of, or entire) existing overhead transmission lines with underground cables;

Rationalisation of the existing transmission and distribution network where they occur in combination through the above measures;

Mitigation techniques to reduce the visual impact of existing transmission infrastructure (for example painting of pylons and other transmission infrastructure);

Collaborative initiatives with National Park or NSA Management Plans/Strategies to mitigate the impact of transmission infrastructure;

Recreational, or social initiatives associated with the use of the National Park and NSAs; and

Other emerging measures which provide enhancement to visual impact of landscape quality which may be recommended by stakeholders.

#### The fund cannot be used for the following purposes:

The construction of new transmission infrastructure:

Other SPEN transmission infrastructure outside areas not yet designated as part of a National Park or NSA (unless justified through the study);

Other landscape, cultural heritage and natural heritage designations – although the consideration of these will be necessary where they are located within National Parks of NSAs (i.e. Sites of Special Scientific Interest (SSSIs), Special Protection Areas (SPAs), Special Areas of Conservation (SACs), National Nature Reserves (NNRs) World Heritage Sites, Scheduled Monuments); and

Mitigation of impacts associated solely with distribution infrastructure.

Any planned replacement or enhancement of existing transmission infrastructure located within National Parks and NSAs is not eligible for the allocation of funds, however where a specific project can demonstrate beneficial mitigations proposals which are in line with the objectives of the Changing the VIEW Project, a co-ordinated approach may be adopted.

A Stakeholder Partnership Group will have the task of deciding, in collaboration with SPEN, which projects or proposals are selected and how the funds could be allocated accordingly.

#### Who will be involved in VIEW?

#### The Stakeholder Partnership Group

SPEN recognise the value and importance of engaging key stakeholders to ensure the best possible success in achieving the stated objectives. SPEN has identified a group of key stakeholders, to be known as the 'The Stakeholder Partnership Group' (SPG), to draw upon local expertise and knowledge with regard to these important protected landscapes.



The first meeting of the
Stakeholder Partnership Group
was held in May 2015 ad sought
to engage stakeholders in the
Changing the VIEW Project and
gather their initial thoughts about
the project, and the designated
landscapes with which they are
familiar, including consideration
of:

What are the special qualities of the nationally designated landscapes that are especially valued?

Are there any specific viewpoints which stakeholders would like to draw attention to?

What is the current opinion in relation to the impact of existing transmission infrastructure within these designated landscapes?

Are there any specific locations which stakeholders would like to flag up?

What are the stakeholder's aspirations of the Changing the VIEW Project?

Any comments the stakeholders have on the proposed approach to the project?

Would the stakeholder partnership benefit from the involvement of any further groups or individuals?

The identified members of the Stakeholder Partnership Group comprise senior representatives of twelve groups and organisations with a national or regional interest in the protection, enhancement and use of the designated landscapes being considered, as well as OFGEM and SPEN.

The twelve invited members, in alphabetical order, currently are:

Friends of Loch Lomond & The Trossachs;

Historic Scotland;

The John Muir Trust;

Loch Lomond & The Trossachs Countryside Trust;

Loch Lomond & The Trossachs National Park Authority;

National Trust for Scotland:

Scottish Hydro Electric Transmission PLC (SHETL);

Scottish Borders Council;

Scottish Government;

Scottish Natural Heritage (SNH)

– Loch Lomond Area;

Scottish Natural Heritage (SNH) – The Scottish Borders Area; and

The Scottish Campaign for National Parks (SCNP).

SPEN envisage that the membership of the Stakeholder Partnership Group will evolve in response to specific local issues, and as needs to engage with further regional and local stakeholder groups arise.

It is expected that the group will advise SPEN on the types of issues which Changing the VIEW should seek to mitigate, and will help undertake the evaluation, and inform ultimate selection of mitigation projects or proposals which emerge.

#### The Stakeholder Partnership Group will help to:

Inform an understanding of how the qualifying areas are used;

Identify the specific infrastructure and locations which would most benefit;

Identify initial priorities for the use of the Changing the VIEW Project, based on defined key selection criteria;

Consider technical input to be provided by SPEN;

Consider the input of wider stakeholders who are not directly represented on the Stakeholder Partnership Group (e.g. specific comments on where use of Changing the VIEW Project funds might be beneficial, or where there is evidence of public support);

Define the projects or proposals which should be taken to the development phase by SPEN;

Re-consider or re-assess priorities and use of the fund, as development of projects progresses;

Investigate the types of issue we may seek to mitigate; and

Investigate the range of potential mitigation measures which may contribute positively to each area.

#### Consultation Strategy

SPEN view the early engagement of stakeholders in the project as pivotal to its success in identifying effective and deliverable mitigation projects or proposals.

In collaboration with the Stakeholder Partnership Group, SPEN will develop a strategy for public engagement and consultation. SPEN will engage further with stakeholder groups in line with the principles laid out in SPENs Schedule 9 Statement and wider commitments.



SPEN wish to engage positively with stakeholders, and the wider public throughout the Changing the VIEW Project, which will be facilitated through the project webpage; stakeholder workshops; and written consultation.

## Working with other Transmission Operators

SPEN will engage with Scottish
Hydro Electric Transmission
Limited (SHETL) who own and
operate the electricity transmission
network in the north of Scotland,
to ensure that, where opportunities
exist to mitigate impacts on
Scotland's valued landscapes, these
are optimised to maximise the
benefits of the OFGEM fund for
consumers.

SPEN will also engage with
National Grid, who own and
operate the transmission network
in England and Wales, in relation to
their own Visual Impact Provision
(VIP) Project in order that a
collaborative approach between
all Transmission businesses can be
adopted. This will encourage the
transfer of knowledge and best
practice.



The purpose of the project is to identify the locations where pre-existing transmission infrastructure has the greatest level of impact on nationally designated, protected landscapes, and where there is greatest opportunity for successful mitigation.

A comparative screening exercise will be undertaken to look at all the sections of overhead transmission lines, and transmission infrastructure and select key areas for more detailed investigation. Potential mitigation of selected transmission infrastructure may include undergrounding, relocation, replacement with alternative infrastructure designs, painting of towers, or landscape enhancements such as planting or green network development.



Identify all the high-voltage transmission infrastructure which affects nationally designated landscapes in Scotland, noting that this may include some sections outside but in close proximity to the designated areas:

Define the study area, based on the distance from the transmission infrastructure beyond which impacts are unlikely to be a consideration;

Prepare a detailed methodology based on established assessment processes, which can be consistently applied in a systematic and transparent way;

In consultation with the Scottish Borders Council, Loch Lomond & The Trossachs National Park Authority and SNH, gather baseline information on the defined special qualities of the designated areas and their landscape character;

In consultation with the Stakeholder Partnership Group, identify the groups of people (visual receptors) who may be affected by transmission infrastructure, and the locations from where they will view it:

Assess the impact of the transmission infrastructure on the landscape and relevant visual receptors;

Compare the relative importance of the landscape and visual impacts, and potential mitigation opportunities, in order to identify key areas for further investigation; and

Present the findings of the study in a written report, supported by maps and photography.

The final technical report will provide the evidence base to be used in support of further investigation, and to support any application to OFGEM for funding to undertake mitigation measures.

The overriding objective of Changing the VIEW will be to achieve the maximum enhancement to the designated landscapes from the allocation of funds, whilst minimising adverse impacts which could arise as a result of any mitigation or enhancement measures proposed.



#### **How will SPEN undertake VIEW?**

To ensure that SPEN is successful in bringing the most benefit from the Changing the VIEW Project, SPEN is committed to working closely and collaboratively with stakeholders, local groups, end users and others, to better understand the impacts of existing infrastructure, and to investigate a range of potential mitigation measures which may contribute positively to each area.

#### Key Selection Criteria

The Stakeholder Partnership Group will be vital in informing the process and will ensure that all decisions are made according to the key selection criteria set out below. By adopting this approach SPEN aims to ensure fairness, best value, balanced decision making, and the highest possible level of engagement in efforts to secure a range of enhancements within our most valued landscapes.

SPEN's key selection criteria are to prioritise potential projects or proposals which will:

Result in the most effective landscape enhancement benefits;

Result in the greatest opportunities to conserve and enhance natural beauty, wildlife and cultural heritage whilst minimising unacceptable environmental impacts;

Represent opportunities for recreational, educational or social initiatives associated with the use and visual experience of the National Park and NSAs, particularly paths and green networks;

Be technically feasible in the context of the wider transmission network; and

Be economical and efficient, and include ways of engaging other stakeholders.

The key selection criteria may on occasion's conflict with one another and as each project or proposal is likely to perform differently against them, the Stakeholder Partnership Group and SPEN will carefully review the decisions made, to ensure consistency and transparency throughout the process.



#### Proposed Methodology

SPEN has appointed expert landscape planning consultants LUC (Land Use Consultants Ltd), to assist in the development of an appropriate methodology for assessment of transmission infrastructure within the scope of the project.

The focus of the study will be the transmission lines (132kV/275kV steel tower and wood pole overhead lines) themselves, but it will also be necessary to consider the impacts of other infrastructure (such as substations and sealing end compounds).

The proposed approach has been developed by SPEN and LUC and is based on the third edition of the *Guidelines for Landscape and Visual Impact Assessment* (GLVIA3)<sup>III</sup>, although it applies the LVIA approach to development which is already present in the landscape. The benefit of this approach is that LVIA is a widely accepted and familiar process, albeit that it must be adapted for a project of this nature.

The proposed methodology for the Changing the VIEW Project has been developed to provide a more focused scope (looking at one National Park and one NSA only) informed by the specific landscape context of the Loch Lomond & The Trossachs National Park, and Eildon & Leaderfoot NSA (although it could be replicated in similar landscapes elsewhere), as well as the Scottish landscape policy context.

#### The key stages in the methodology will include:

Desk study;
Field survey;
Detailed landscape and visual impact assessment (LVIA);
Review of the importance of the identified impacts; and
Input from the Stakeholder Partnership Group throughout the project.

The approach will draw on published guidance and established good practice, and is aimed at providing clear justification for the targeting of measures which may be implemented to mitigate the most adverse landscape and visual impacts. The project will be led by experienced Chartered Landscape Architects (CMLI), with a broad local knowledge of the protected landscapes within which the transmission infrastructure to be assessed is located.

A detailed method statement will be prepared by LUC, informed by initial field based testing of the approach undertaken in December 2014. Consultation with the Stakeholder Partnership Group is envisaged to agree the detail of the approach.

# What is the timeline for Changing the VIEW?

#### Indicative Programme

SPEN began the main part of the project in Spring 2015, with a meeting of the invited members of the Stakeholder Partnership Group, SPEN and OFGEM in May 2015. It is envisaged that the project will follow the indicative programme outlined below:

Spring 2015	Summer 2015	Winter 2015	Spring 2016
Engage Stakeholder Partnership Group	Develop & Finalise Method Statement	Review of LVIA Impacts	OFGEM approval of identified Proposals/ Projects
Finalise the Approach to & Scope of the Project	Identification of Transmission Infrastructure to be assessed	Engagement with further Stakeholder Groups/Public	Implementation of successfully approved Proposals/ Projects
Approach to the Project Reviewed by Ofgem	Undertake LVIA Field Survey & Assessment	Identification of mitigation Proposals/ Projects	

#### References

i National Parks (Scotland) Act 2000

ii The Planning etc. (Scotland) Act 2006 & The Town and Country Planning (National Scenic Areas) (Scotland) Designation Directions 2010 iii Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment 3rd edition.

# How can you get involved in Changing the VIEW?

SPEN believe that this project offers a major opportunity to make a meaningful contribution to Scotland's landscapes. By engaging stakeholders throughout the project, we hope that they will provide valuable knowledge and advice in relation to addressing the impact of existing transmission infrastructure which can be cited as detractive, and lead to genuine enhancement of some of Scotland's most valued landscapes.

#### Members of the Stakeholder Partnership Group





























For more information about Changing the VIEW

www.spenergynetworks.co.uk/pages/ view\_project.asp

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