

English Heritage comments on National Grid's Proposed Approach to undergrounding new electricity transmission lines

We are content with the general principles set out within both the 'proposed approach' and 'technical issues' documents, which acknowledge the need for advice on cultural heritage, consultation with experts, openness about its decision-making processes, and balancing of issues. Whilst we appreciate that the 'Proposed Approach' document in particular is intended to be a general statement of over-arching principles relating to the processes for decision making, we do feel that more detailed information on 'appropriate stakeholders' should be reflected elsewhere, if not within this document.

In addition to obligations under the Electricity Act 1989 to consider 'the desirability of preserving amenity', which is interpreted by National Grid as including cultural heritage, although underground cables fall within permitted development, and do not therefore require planning permission, there are of course additional statutory obligations under other legislation. For cultural heritage these might include, for example, the provisions of the Ancient Monuments and Archaeological Areas Act 1979.

We note in the 'proposed approach' document the 'In formulating our proposals we will take into account the analysis of expert consultants; the policies and guidance of government and of official bodies on wildlife, countryside and heritage issues; the policies and advice of local authorities; and the opinions of local communities and their representatives'. In addition to the need to consult English Heritage in relation to designated assets, we would stress the necessity of dialogue with local authority Historic Environment staff in order to take data held within the Historic Environment Record in to account. Like all such proposals, success depends on:

- early and adequate pre-application dialogue
- full consideration of the potential options, if necessary informed by archaeological assessment / evaluation
- good proportionate decisions on often competing values / interests (e.g. visual amenity versus impact on buried archaeology)
- appropriate mitigation

Under the 'Planning and environmental issues for underground cables' section of the 'technical issues' document it would also be useful to see specific recognition for the issue of the impact of overhead lines on the setting of cultural heritage assets. The document looks at issues around the edge of this subject, such as designated landscapes, visual amenity, cultural heritage, but none of these are quite the same as setting of historic assets. Whilst overhead lines may not physically damage or disturb a Scheduled Monument, Listed Building or a Registered Park and Garden, it may nonetheless materially alter the specific historic, architectural or archaeological importance of the asset or its setting. In such circumstances consent (under Ancient Monuments or Listed Building legislation) would be required.

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