

## **Introduction**

The Landscape Institute (LI) is an educational charity and chartered body responsible for protecting, conserving and enhancing the natural and built environment for the benefit of the public. It champions well-designed and well-managed urban and rural landscape. The LI's accreditation and professional procedures ensure that the designers, managers and scientists who make up the landscape architecture profession work to the highest standards. Its advocacy and education programmes promote the landscape architecture profession as one which focuses on design, environment and community in order to inspire great places where people want to live, work and visit.

The LI welcomes the approach set out in the draft overarching National Policy Statement (NPS) for Energy and in submitting this response wishes to strengthen its current content. In respect of section 2.1, we would encourage recognition of the strong relationship between climate change and landscape. The landscape has frequently been perceived in some quarters as the recipient of landscape and visual effects from energy related development which are wholly and solely adverse. What needs to be recognised is the fact that even if one were to adopt a negative stance to such proposals (those aimed at tackling climate change), it must still be acknowledged that both contemporary and cultural 'time-depth' landscapes will also be the beneficiary of moves to slow down and better manage the effects of climate change. On any analysis therefore, renewable energy projects as well as those seeking to replace outdated and inefficient energy infrastructure with more efficient forms of energy generation, bring material and significant landscape benefits in the context of the response to climate change.

However, this should not be taken as an unqualified endorsement of the draft NPS. Whilst sound in many respects, the LI believes that the draft can be improved through the incorporation of a number of important points, both general and specific. These are set out below and numbered according to the paragraphs set out in the draft NPS.

## **Draft Overarching Energy NPS (EN-1)**

### **General comments for consideration**

'Landscape' is a holistic concept which extends to and embraces a number of subjects which have traditionally been regarded as separate and discrete such as nature conservation, ecology and cultural heritage. The LI believes strongly that it is essential that, in separating the environment into a number of defined subjects, developers need to be made aware that it is extremely important that the linkages between these subjects are also included within their assessments.

Having introduced this matter, it then becomes incumbent on the Infrastructure Planning Commission (IPC) to ensure that a more synoptic understanding of landscape has been adopted and addressed satisfactorily by developers when submitting assessments with their proposals.

The LI welcomes and endorses the NPS' recognition that landscape should be understood as embracing seascape and townscape where relevant.

The LI is concerned that, whilst acknowledging the need for a faster and less arbitrary decision-making process, local interests are not ignored or lost within the plethora of responses that will inevitably be made to proposals. While the local planning authority will clearly be an important player in making responses to the IPC, as will statutory consultees, there is a large body of information within the repository of the local communities who may be affected. Developers must be reminded that local consultation must not be tokenistic. Timely provision of accurate and accessible information to, as well as genuine engagement with, local interests will be essential if the IPC is to be made fully aware of all relevant concerns.

The LI endorses all references to the need for good design to be at the heart of the process. However, we would encourage the Department for Energy and Climate Change (DECC) to ensure that the process extends not only to the construction and operational stages of infrastructure development but also to the decommissioning stage. Further, we wish to encourage DECC to regard and make fully explicit the fact that cumulative considerations extend not only to other proposals of a similar nature in the vicinity, but to include both 'downstream' requirements, for example, grid connection and secondary requirements such as climate adaptation measures so that all aspects of a proposal's effects can be considered at the same time.

Finally, we would encourage DECC to stress the importance of sound, up to date, baseline information. In the landscape and visual sphere this must include consideration not only of published character assessments but also whether they cover the relevant areas potentially affected at an appropriate scale, and, if they do, whether they are still relevant. Potential applicants must be encouraged to accept that new or refreshed landscape character assessments may sometimes be necessary if proper consideration is going to be given to the potential effects of energy generation proposals and their related downstream and secondary infrastructure.

### **Specific comments for consideration**

#### **Paragraph 1.2.1**

Not only will the draft NPS be helpful to local planning authorities in preparing their local impact reports, it will also be invaluable to statutory consultees and relevant third parties without whose carefully considered input to the IPC, responses will be deficient. The LI is concerned to ensure that local interests and concerns are not lost or obscured in the process of rapid decision-making (see paragraph 1.6.12 which refers to the need to speed up the delivery process).

#### **Paragraph 1.3.2**

We appreciate that the 50 MW threshold has been adopted via the Planning Act 2008. The LI is concerned that there needs to be a mechanism for, or at least clear guidance concerning, the way in which consistency can be secured in the treatment of projects on both sides of this threshold. It would be unfortunate indeed if one set of rules, considerations and precedents applied to a project of 49 MW and another conditioned the treatment of a 51 MW project. The treatment applied to the first set of major infrastructure proposals will be regarded as precedents for both subsequent and smaller scale projects.

#### **Paragraph 1.6.1**

The LI recognises that the planning system is regarded by many as a stumbling block slowing down the delivery of projects which are otherwise appropriate. The LI therefore welcomes efforts to speed up the delivery of acceptable projects provided all relevant matters have been taken properly into account. One matter which is of concern is that developers may be tempted to increase the scale of their proposals beyond the 50 MW threshold because the current <50 MW system is perceived to be too inconsistent and subject to whim. However, by increasing the scale of proposals to ensure a faster, unbiased judgement in accordance with policy may lead to over-development of sites beyond their capacity to accommodate landscape and wider visual change in an acceptable manner. Accordingly, the LI wishes to encourage developers and decision-makers to have regard to recent landscape capacity studies, where they exist, or provide independent capacity studies as part of the environmental impact assessment (EIA) process to accompany applications where they are otherwise absent.

#### **Paragraph 3.5.2**

Although referred to under the sub-heading of nuclear power generation, related investment in transmission and distribution infrastructure is clearly a generic subject which must be considered along with the individual projects within the various categories of energy generation – hence the separate draft NPS on the subject. The LI believes that it would be more appropriate to flag this matter 'up front' as a generic consideration likely to be applicable to all proposals in one way or another with attention drawn to section 3.8 and the separate draft NPS.

### **Paragraph 3.8**

This section clearly states the need for substantial changes in the type and location of energy generation infrastructure and, with it, expansion and reinforcement of the UK transmission and generation networks including extension into areas that have not seen such developments. The LI is concerned that decisions taken in one quarter could pre-empt rational and reasonable decisions in another. By this we mean that a decision to grant consent for an energy generation proposal without having had full regard to the off-site infrastructural requirements could place undue pressure on decision-makers to grant consent for the 'downstream' elements. As such, we consider that it is essential that all major aspects of a proposal to generate and transmit electricity from source to consumer should be considered as a single package of development.

### **Paragraphs 3.9 and 3.10**

Sections 3.9 and 3.10 dealing with gas supply, infrastructure and pipelines will bring their own sets of relatively unique linear landscape and visual effects associated with pipeline construction. This should be noted with cross references to the relevant NPS.

### **Paragraph 4.1.1**

It is stated that the IPC should adhere to the set of principles set out in Part 4. For consistency and efficiency, it should be made clear that developers, LPA's, other statutory consultees and third party groups and individuals should also be aware of and adhere to a clear understanding of these principles when either formulating proposals or responding to them.

### **Paragraph 4.2.1**

Concerning environmental impact assessment (EIA), it should be noted that the LI considers that a proper understanding of 'landscape' considers a more holistic concept which embraces fauna, flora, cultural heritage and other conservation interests. For the purposes of this and other responses we will address landscape and visual matters in the more narrow traditional sense and would hope that DECC recognises and stresses within the documents that these aspects inter-relate and that full recognition must be given to the need to ensure proper coordination amongst those responsible for carrying out assessment in these sub-fields.

### **Paragraph 4.2.1 – Footnote 19**

The effects on human beings also includes visual effects as well as effects on health.

### **Paragraph 4.2.3**

Concerning cumulative impacts, it should be stressed that these relate not only to projects within the same generic category or with regard to 'downstream' aspects, but also to other consented or proposed projects in the vicinity.

### **Paragraph 4.4.1**

This paragraph refers to 'certain circumstances' with respect to the consideration of alternatives. It would greatly assist understanding if examples could be given.

### **Paragraph 4.4.3**

The first bullet point flags up the urgency of the need for energy infrastructure and the LI does not dispute this. However we are keen to ensure is that, in seeking rapid decision-making, there should be 'proper' rather than 'proportionate' consideration of alternatives.

### **Paragraphs 4.5.1 to 4.5.5**

The LI endorses the statements made in this section throughout paragraphs 4.5.1 to 4.5.5 and would seek only to change or qualify the word 'quality'. The LI recognises the former Countryside Agency's and Scottish Natural Heritage's use of the term 'quality' as chiefly relating to condition. It is assumed that DECC mean scenic quality as opposed to the landscape's condition. Nevertheless, whereas it may not be possible to enhance scenic quality, good design can be employed within landscape proposals such that local enhancements to the fabric, elements and patterns which give a landscape its character can be

incorporated to bring positive benefits within the context of overall change. This should be encouraged by the NPS.

However DECC should note this is subject to the relevant powers being available, for example, National Grid has no powers to CPO land for landscape mitigation and can only plant by agreement with landowners. Optimum siting from a landscape and visual perspective is therefore the main means of mitigation.

The LI accepts that landscape and visual matters are but two of the many factors to be taken into account in the decision making process but we wish to stress that they are very important considerations because they can be fundamental to both an individual's and a community's well-being. When a location is, or may be, sub-optimal from the visual and landscape perspective it becomes even more important that mitigation through site planning, design and other measures is fully explained and fully incorporated into the consent process.

#### **Paragraph 4.8.4**

Under the heading 'Climate change adaptation', recognition must be given not only to the need for sound planning and positive design for the proposed development, but also that this should be extended to include all relevant climate change adaptation measures. As noted in this paragraph, adaptation measures may give rise to additional impacts and clearly, visual and landscape considerations may figure highly within that spectrum. It will be very important in the acceptance of the schemes under consideration that (a) landscape planning and design should be of the highest standard and (b) that it should extend to all aspects of the proposal – primary, secondary and 'downstream' as part and parcel of an integrated approach. 'Downstream' impacts such as those related to electricity transmission and grid connection and secondary impacts such as those related to climate change adaptation measures should not be regarded as additional 'extras' or matters to be 'bolted on' at the end of the decision-making process. The importance of integration of all stages and elements must be emphasised.

#### **Paragraph 4.16.1**

Concerning generic impacts, in paragraph 4.16.1, we suggest that the first sentence be expanded slightly to read as follows: 'Some impacts will be relevant to any energy infrastructure, whatever the type for example those relating to landscape character and visual amenity.'

#### **Paragraph 4.18**

Concerning biodiversity and geological conservation, this is an area which fits within the more holistic understanding of 'landscape'. The LI recognises and accepts that the subject can be treated in a discrete manner provided the need for biological and geological specialists to forge links with 'traditional' landscape assessment is accepted and encouraged. The need to adopt a synoptic approach to integrate various aspects of the 'landscape' extends also to encouraging integration with cultural heritage experts so that the breadth and depth of 'landscape' is fully covered.

#### **Paragraph 4.19.20**

Lighting is a subject which is exercising minds with respect to visual impact. It is understood that MoD requests in respect of on-shore turbine proposals are that certain turbines be illuminated with omnidirectional lighting with a minimum output of 25 candela. It should be explicitly recognised by the IPC that setting a minimum level of illumination is not of itself sufficient. If the MoD is content with a 25 candela level then that is the level which should be specified and fitted. It is understood that lighting levels, like noise, are scaled in a logarithmic manner. To condition a development with a lighting requirement that illumination should meet a minimum 25 candela performance means that a light with an output of 200 candela would meet the condition but would have a wholly different level of impact compared to 25 candela. The minimum level of lighting should also be the maximum level.

#### **Paragraph 4.20**

Concerning coastal change, under the matters to be assessed by applicants (4.20.6), there seems to be a very notable omission. Applicants should also assess the potential effects with respect to landscape

character and visual amenity especially since coastal landscapes are frequently highly valued not only by local communities but at the national level also.

#### **Paragraph 4.20.12**

We suggest that this paragraph be extended to read: ‘...coast on site and site on coast having particular regard to landscape character and visual amenity.’

#### **Paragraph 4.21**

With respect to this section and mention of artificial lighting, smoke and steam, the LI recommends that attention be drawn to the potential effects that can arise particularly with regard to visual amenity and the need for this matter to be taken into account in the ‘Applicant’s Assessment’.

#### **Paragraph 4.22**

With respect to this section, we suggest that under the ‘Applicant’s Assessment’ heading reference should be made to the need for the flood risk assessment to be integrated with the landscape and visual impacts assessment within the 5<sup>th</sup> bullet point given that flood risk management infrastructure including raised defences, flow channels, flood storage and other features can have major local effects with respect to landscape character and visual amenity. At the same time, IPC decision making should ensure that the recommended integrated approach has been adopted.

#### **Paragraph 4.23**

Comments made previously concerning the need for a holistic, integrated approach with respect to landscape and visual matters apply equally to cultural heritage considerations.

#### **Paragraph 4.23.9**

This refers to the possible requirement for visualisations to demonstrate the effects of proposed energy infrastructure on historic landscapes. A similar note could be included within the landscape and visual section where visualisations could be utilised to demonstrate the effects of proposed energy infrastructure on the landscape or visual interests.

#### **Paragraph 4.24.1**

The LI welcomes the recognition that landscape is not a subject limited to the countryside but encompasses seascape and townscape where relevant. However the overall thrust of the wording of this section seems to place emphasis on designation and less emphasis on character based approach, therefore not in line with thrust of PPS7. It may assist to include the European Landscape Convention definition of landscape somewhere in this section, possibly as a footnote.

Article 1 of the European Landscape Convention (ELC), which was ratified by Government in 2007, states that landscapes means:

*‘...an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors. The term ‘landscape’ is thus defined as a zone or area as perceived by local people or visitors, whose visual features and character are the result of the action of natural and/or cultural (that is, human) factors. This definition reflects the idea that landscapes evolve through time, as a result of being acted upon by natural forces and human beings. It also underlines that a landscape forms a whole, whose natural and cultural components are taken together, not separately.’*

Reference should be made somewhere within section 4.24 to any cumulative landscape and visual effects with other existing, proposed or consented development.

#### **Paragraph 4.24.2**

One matter which should be considered here is the need to assess whether such published landscape character assessments, as may exist, remain valid and are not out of date. Where this is the case, applicants must be encouraged to provide new or refresh existing character assessments so that decision-making is fully informed with the most relevant baseline information ‘to the proposed development’.

### **Paragraph 4.24.3**

This paragraph requires extension to include consideration of decommissioning effects.

### **Paragraph 4.24.4**

The LI suggests that assessing the effects of light pollution on nature conservation aspects should be re-directed to the section which deals with biological and nature conservation matters.

### **Paragraph 4.24.5**

The LI recommends the following:

- Line 2: after 'quality' insert 'i.e. condition'. After 'valued' add, '**its sensitivity** and its capacity to accommodate change **of the nature envisaged by any particular proposal**';
- Line 2: after 'change' insert 'which can vary according to the type of development under consideration and also according to the arrangement of the elements comprising a particular proposal'; and
- Insert a further sentence at the end: 'Where possible, proposals should include measures to secure environmental enhancement whether solely in relation to traditional landscape and visual concerns or in combination with other related aspects e.g. ecology, nature conservation and/or cultural heritage considerations.'
- Include wording which recognises that often the main opportunity for mitigation of energy infrastructure development is in the selection of the most appropriate route or site, taking account of topographic, land cover and landscape character considerations.
- Mention the value of visualisations (and virtual reality models on occasion) in assisting the IPC in determining landscape and visual impacts (as noted within cultural heritage section).

### **Paragraph 4.24.6**

An adjustment to this paragraph is necessary to ensure clarity of purpose. This requires the deletion of: '...of the landscape and countryside' in lines 5 and 6, to be replaced with 'and the special qualities which underpin the designations...'

### **Paragraph 4.24.7**

3<sup>rd</sup> bullet point, after 'effect' insert 'with respect to the special qualities of the area in question as well as'... Change 'moderated' to 'mitigated'.

### **Paragraph 4.24.8**

The LI recommends the addition of a further sentence to read: 'It should be noted that this does not mean the acceptance of poor standards in non-designated areas.'

### **Paragraph 4.24.11**

The LI believes that, as written, the text overemphasises local designations which is not in accordance with thrust of PPS7 which states that:

*'The Government recognises and accepts that there are areas of landscape outside nationally designated areas that are particularly highly valued locally. The Government believes that carefully drafted, criteria-based policies in LDDs, utilising tools such as landscape character assessment, should provide sufficient protection for these areas, without the need for rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas.'*

*Local landscape designations should only be maintained or, exceptionally, extended where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection. LDDs should state what it is that requires extra protection, and why. When reviewing their local area-wide development plans and LDDs, planning authorities should rigorously consider the justification for retaining existing local landscape designations. They should ensure that such designations are based on a formal and robust assessment of the qualities of the landscape concerned'.*

More consistency is needed in wording between two documents.

In addition, it is also worth noting that difficulties arise where there are different approaches to designation between different local authorities and the development spans authority boundaries. Local landscape designations may designate areas in one authority that are of lower 'value' than landscape in a neighbouring authority that have followed character based approach. In such cases a character based approach should prevail to avoid local designations in one authority steering the development away from what may otherwise be the optimum route or site. The landscape sensitivity to the particular type of development should be established to assist comparison of alternatives and guide the choice of route or site.

**Paragraph 4.24.12**

The LI suggests that the draft would benefit from the deletion of: 'within many miles....infrastructure.' and insert: 'but the extent of visibility will vary from type to type and project to project.'

**Paragraph 4.24.14**

We feel that it is essential the DECC stipulates that harm, in itself, is not unacceptable or determinative. The key issue is to determine whether *unacceptable* harm would arise and to be explicit as to what renders the harm unacceptable as opposed to acceptable. This may be because the quantum of perceived harm may be small or significant only in a context which is not especially important or it may be that a larger quantum of deemed significant harm is considered to be outweighed by the benefits arising.

**Paragraph 4.24.15**

The first sentence needs to be extended, and the LI suggests the following: '...around proposed sites and, potentially, farther afield.' Visual effects may be limited in extent but, frequently, they can extend much farther than the local context of a site.

Concerning receptors, we suggest that the sentence be extended to read: '...the local area and those seeking outdoor recreational opportunities...'

The LI suggests the addition of a sentence similar to that included within landscape section: '...the IPC should consider whether the project has been designed carefully, taking account of visual effects on receptors and siting, operational and other relevant constraints, to minimise harm to visual receptors, including by reasonable mitigation, and taking account of the need to **balance** landscape and visual considerations.'

The LI believes that a mention of the value of visualisations (and virtual reality models on occasion) would be helpful as they can assist greatly in determining visual impacts.

It is correct to say coastal areas are particularly vulnerable but other areas are too –e.g. skyline situations on hilly or mountainous terrain.

**Paragraph 4.24.16**

If this approach is to be followed, the same would also apply to landscape and to other disciplines within the document. However as each situation is unique, the LI is not convinced this is necessarily helpful; also developments that have been consented historically may not have been subject to the same rigours of assessment as new development today.

The LI believes the following should be inserted 'The IPC recognises that with many types of energy infrastructure development the main opportunity for mitigation of the landscape and visual effects of the development is in the selection of the site or route which minimises harm to these considerations. It is also recognised that opportunities to undertake effective mitigation at a distance from the development can only be undertaken by agreement with landowners. Nevertheless the IPC needs to satisfy itself that every effort would be made to secure effective mitigation through the means available to the developer'.

**Paragraph 4.24.18**

Insert at beginning of sentence, 'While it is recognised that energy infrastructure developments can not always comply with planning policy which require development to contribute to the landscape and visual enhancement, within a defined site (or route) .....within that site (or route) ..The last sentence should

be amended to read as follows: 'Materials and designs of buildings and external works should always be given careful consideration as should their relationship with the planning and design of climate change adaptation measures.'

#### **Paragraph 4.25.6**

We are concerned that this paragraph introduces a sequential test for energy generation proposals (including renewable energy development) which is therefore in conflict with PPS 22. It may be appropriate to encourage the re-use of previously developed land for some forms of energy generation but it would be inappropriate in the case of wind energy development and overhead transmission lines. The last sentence of this paragraph is not strong enough. It might be far less ambiguous and potentially contentious to drop the reference in this NPS and to introduce it only with respect to the energy generation forms where it is relevant via the individual energy related NPSs.

#### **Paragraphs 4.25.12 and 4.25.20**

Some recognition needs to be given to the fact that overhead lines frequently require a Green Belt location in order to provide power supplies to urban areas.

### **DRAFT NPS FOR FOSSIL FUEL ELECTRICITY GENERATION (EN-4)**

#### **Paragraph 1.3.2**

We note that the NPS does not repeat the material set out in EN-1. However, it would be sensible to inform the reader that EN-2 should be read alongside EN-1 to ensure that generic guidance is not missed.

#### **Paragraph 2.2.1**

The size of the site will have to be large enough not only to conform to Government policy on CCR and CCS and mitigation measures for emissions but also mitigation measures associated with visual, landscape and other related matters.

#### **Paragraph 2.2.6**

Insert 'and landscape' in the 4<sup>th</sup> bullet point to read: 'the visual and landscape

#### **Paragraph 2.3.15**

This paragraph should recognise that design solutions to ensure that projects are resilient to climate change effects may, in themselves, require engineering solutions which may in turn have their own set of visual and landscape effects which will need to be addressed.

#### **Paragraph 2.6.1**

It is not sufficient to mention National Parks, the Broads and Areas of Outstanding Natural Beauty. The LI suggests the insertion 'and their settings' after '...Natural Beauty'.

#### **Paragraph 2.6.5**

This paragraph is rather 'light'. It is suggested that further text be inserted after '...the stack' to read: 'and the visual impact of the stack and other parts of the construction which, whether individually or collectively, may give rise to significant visual effects in the context of the local and wider landscape.'

#### **Paragraph 2.6.7**

To suggest that 'the best fit' could open the subject to considerable debate as to what constitutes 'best'. The first sentence might be worded as follows: The IPC should expect applicants to design fossil fuel generating stations with the aim of providing the most appropriate fit having regard to all relevant matters so that adverse landscape and visual amenity effects are minimised. 'Minimised' is defined as 'reduced to the level at which landscape and visual concerns are considered to have been addressed satisfactorily'.

However the IPC should also expect applicants to have regard to the potential for, and to put in place measures to secure, environmental enhancement where practicable.

#### **Paragraph 2.6.10**

Noting that the word 'minimise' is used here, it may be worthwhile putting the above definition in a footnote or repeating it.

#### **Paragraph 2.6.11**

The sentiments expressed in this paragraph are understood and accepted. However, it is suggested that the IPC might also give consideration to the desire to incorporate environmental enhancement measures are suggested for paragraph 2.6.7. This might require the phrase 'and to take advantage of opportunities for environmental enhancement.' To be added to the last sentence.

### **DRAFT NPS FOR GAS SUPPLY INFRASTRUCTURE AND GAS AND OIL PIPELINES (EN-4)**

#### **Paragraph 1.3.1**

Insert words to read: 'policy on good design, climate change adaptation, climate change resilience measures, landscape planning and other matters....'

#### **Paragraph 1.3.2**

We note that the NPS does not repeat the material set out in EN-1. However, it would be sensible to inform the reader that EN-2 should be read alongside EN-1 to ensure that generic guidance is not missed.

#### **Paragraph 2.7.6**

Add words at the end: 'Coastal locations may be highly regarded by the public and they may be potentially sensitive to the installation of such facilities both in terms of landscape character and visual amenity.'

#### **Paragraph 2.7.13**

It would be appropriate to add to the end of this paragraph words to the effect: 'It should be noted that CCR measures may well require additional works which, in themselves, will give rise to a further round of potential visual and landscape effects which need to be considered.'

This section appears to be rather 'light' when compared for example with Section 2.6 of EN-2 (Fossil Fuel Energy Generating Infrastructure). It is suggested that EN-4 be expanded along the same lines to include 'Applicant's Assessment' and 'IPC Decision Making' and include general sentiments along the same lines as those set out for Fossil Fuel generating Stations.

#### **Paragraph 2.8**

Section 2.8 requires a sub-section to be added: Gas Reception Facilities Impacts: Landscape and Visual and 'filled out' under the headings: Introduction, Applicant's Assessment, IPC Decision Making and Mitigation.

#### **Paragraph 2.9.21**

This paragraph might also benefit from reference to the potential for securing habitat and landscape/visual enhancement as part and parcel of any reinstatement scheme.

### **DRAFT NPS FOR ELECTRICITY NETWORKS INFRASTRUCTURE (EN-5)**

#### **Paragraph 1.3.2**

As before, we note that the NPS does not repeat the material set out in EN-1. However, it would be sensible to inform the reader that EN-5 should be read alongside EN-1 to ensure that generic guidance is not missed.

#### **Paragraph 2.2.4**

The potential problems associated with the location of substations can extend beyond simple matters of topography and the 'possibility' of screening. It is suggested that the sentence be reworded as follows:

'...taking into account landscape character, local topography, the potential need for screening and other environmental considerations.'

**Paragraph 2.2.5**

While drawing attention to Schedule 9 of the 1989 Electricity Act is welcome, the LI feels that the strength of this paragraph could be increased with the addition of the following: 'Applicants will also be expected to have regard to visual amenity when formulating proposals.'

**Paragraph 2.7.2**

While the LI welcomes the sentiment expressed in this paragraph, though suggest that the final sentence be extended as follows: '...network infrastructure and through incorporation of landscape, habitat and other environmental enhancement measures.'

*The Landscape Institute would like to thank DECC for the opportunity to respond to this consultation. For any queries and future consultations please contact Stephen Russell, Policy and Public Affairs Officer at [stephenr@landscapeinstitute.org](mailto:stephenr@landscapeinstitute.org)*

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