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1. An Ofgem Review (of Strategy and Policy) was published 12 July 2011 by government department DECC and can be accessed from [http://www.decc.gov.uk/en/content/cms/meeting\\_energy/markets/regulation/regulation.aspx](http://www.decc.gov.uk/en/content/cms/meeting_energy/markets/regulation/regulation.aspx)

2. The Ofgem Review is principally about the role of regulator and government with regard to climate change policy. Although the policy is leading to the largest UK grid development for decades, the Review is not about power lines and their impact on the environment. Environmental aims are about reducing carbon (more wind farms and more pylons), not about the landscape. Word search found no occurrences (either in the Review or in its accompanying Impact Assessment) for any of the following strings: powerline, power line, pylon, transmission line, electric line, overhead, EMF, magnet, visual. The word 'landscape' appears several times in the Review (none in the Impact Assessment) but always as 'policy landscape' or similar, never meaning the natural landscape.

3. There will be a DECC Strategy and Policy Statement following from the Ofgem Review. This DECC statement will be part of the policy framework for future transmission strategy but seems unlikely to address the social and environmental impact of powerlines, other than impact on climate change, and even that is likely to be superficial and distorted as usual. The Strategy and Policy Statement will be established under new primary legislation, through Parliament. Section 141 of the Ofgem Review suggests that DECC will draft the final form of the Statement in parallel with the legislation, and only then consult on the content.

4. The policy documents closest to the impact of powerlines will continue to be the Energy National Planning Statements (NPSs, see news319 & 322) from DECC, and NG's Environment Policy (latest 2009) and Schedule 9 Statement, required under the Electricity Act (EA) 1989. NG's Schedule 9 Statement is widened into a "Stakeholder, Community and Amenity Policy", latest of Feb 2010. <http://www.nationalgrid.com/corporate/Our+Responsibility/Managing+our+Impacts/Ourpolicies/>  
<http://www.nationalgrid.com/uk/LandandDevelopment/SC/Responsibilities/>

5. The reason policies for powerlines are weak, from the perspective of public objectors, is that the statutory legislation requires NG and other licence holders only "to have regard to ... preservation of amenity" (EA Sch9, required by Section 38) and to do what they "reasonably can" in mitigation. Section 9 (as distinct from Schedule 9) of the EA sets out general duties of licence holders (like NG) and Section 3 does likewise for Secretary of State and Director General (Ofgem; also see below). The principal aim in the EA was for an effective, competitive, privatised electricity

market. This still persists in the latest amended legislation, after the Utilities Act 2000, Energy Act 2010 etc.

6. Box 3 of the Ofgem Review sets out Ofgem's current duties, formally separating primary from secondary duties, to support its "primary objective" of protecting consumers' interests including the reduction of greenhouse gases. The key change over the years has been the inclusion of reduction of greenhouse gases as a consumers' interest, though other environmental impacts are still relegated to secondary duties, and even there to (merely) "having regard to". The result is that public concerns about visual impact and EMF from powerlines fall behind safety, security, efficiency and economy.

7. To its credit, NG does maintain a range of policy documents available on its web site (see item 4 above), with many good words. Its EMF statement was last reviewed April 2011; it sets out "seven central principles" which seem reasonable and helpful. Sadly the statement persists with the claim that "The balance of evidence remains against both power-frequency and radio-frequency EMFs causing ill health." NG is entitled to its view, but it should state that this is just its view and not the official view of IARC and WHO. We disagree with this view as it fails to respect the uncertainty inherent in the science and it lacks both clear definition of evidence and objective measurement of balance – it is the subjective view of an interested party, and should not be proclaimed assertively as if it were objective or absolute.

8. Public concern group PLACE, objectors to the Woodhead – Stalybridge 400kV overhead line in the Peak District National Park, together with the Campaign for National Parks (CNP), met with Ofgem in June. Ofgem agreed to review willingness-to-pay analysis of avoiding overhead line impacts. Ofgem seemed to share concern about the non-appearance of the KEMA review and said they were moving to life-cost accounting instead of just capital cost, but this will take time. PLACE's meeting report notes Ofgem said it would be irrational if power companies didn't take up the ringfenced money on offer for social and environmental undergrounding; having a more costly asset is financially to their advantage apparently.

9. PLACE reports from its meeting with National Grid at the NG HQ in Coventry last week: "Hector Pearson was very firm that NG had given enormous amounts of info to the IET/KEMA study. That what Tessa Munt said in Parliament, about NG failing to give enough evidence to the study, during the presentation of her '10 minute Bill' was untrue. NG was clearly not a little miffed by the accusation. Hector said that the problems over the study were caused by other companies not wanting to give commercial information to KEMA which is a big player in the field. (Presumably NG was not concerned by this?!) He assured me that the study would be available by the end of this year."

10. "PLACE's view of the new Strategy for Ofgem is that it is quite properly addressing the need for to decarbonise the UK energy system for the atmospheric environment BUT has scant awareness of the major impact this would have on the rest of the environment – i.e. on important and precious landscapes not to mention 'existential openness,' health, property value etc."

<http://www.p-l-a-c-e.org/>

11. Last year Alasdair Philips had raised the subject of the 95km Rowdown (Surrey) – Lydd (Kent) 400kV line (news312, 315), then due to start construction in 2017. Now Alasdair notes that the 2011 NG SYS document (legally required to show their plans for the next 7 years) shows the line as being partly built by Winter 2014 and fully operational by winter 2017. CPRE has also raised the subject, according to articles in [www.thisiskent.co.uk](http://www.thisiskent.co.uk).

12. An academic paper claims “There is overwhelming evidence that wind turbines cause serious health problems in nearby residents, usually stress-disorder-type diseases, at a nontrivial rate.” [Carl V. **Phillips**, *Bulletin of Science, Technology & Society*, August **2011**; vol. 31, 4: pp. 303-315.] Issues of noise from turbines, how it is measured and how it affects health, may have something in common with EMF – financial and personal interests, and obfuscation.