



15th December 2023

Cotswolds Visual Impact Provision

We are very concerned to see in the Draft Determination on NGET's North Wessex Downs Visual Impact Mitigation Re-opener that:

"5.22 Considering the above factors, our draft determination position is to approve this application for funding. However, we also agree with NGET, that going forward, given it is unlikely that market conditions will stabilise in the short term, it would not be in the consumers interest to prioritise visual impact improvement funding applications in RIIO-2."

It has been made clear to us that this is not National Grid's position and that the Cotswolds project is to be brought forward in RIIO-2 with a planning application due to be submitted in spring 2024 and a funding submission later in 2024 - in line with RIIO-2 and the £465m provision agreed with Ofgem.

Much time and effort by NGET, communities and stakeholders has been spent over the past two years with surveys, design and engagement.

The Cotswolds VIP has a lot of support from the surrounding communities as well as from the local authorities and NGOs. The number of negative comments made during the extensive stakeholder and community engagement has been a very small.

The response of Ofgem to the Draft Determination on NGET's North Wessex Downs Visual Impact Mitigation Re-opener regarding the funding of the North Wessex Downs project and the inclusion of paragraph 5.22 is particularly surprising as Ofgem was supporting VIP and NGET's VIP Policy earlier this year and has participated in discussions on the development of the Cotswolds project.

The planned removal of 7km of overhead powerlines and around 20 pylons will have a dramatic positive impact on the landscape. The Cotswold Way National Trail runs alongside this section of line and the very popular and well used Cleeve Common abuts the line which also passes over an arm of the common. It is an area of the Cotswolds with a high level of recreational use and an area of open, dramatic landscape. The tangible benefits are huge, the intangible benefits more so.

The Levelling Up and Regeneration Act 2023, which comes into force on 26th December, includes new legislative requirements for AONBs and National Parks:

"In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

Continued..

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Both National Grid and Ofgem are relevant authorities. National Grid are seeking to further the purpose of conserving and enhancing the natural beauty of the Cotswolds AONB by reversing the harm caused by this section of powerlines and pylons and it looks like Ofgem is now proposing to prevent this happening and therefore itself failing to further the purposes as the Act requires.

Our understanding is that when the network of transmission lines was first developed, the intention was to bury the lines close to or that would go over sensitive areas but this did not happen due to the need to quickly create the distribution network. The VIP programme seeks to reverse this in a focused and impactful way.

Ofgem needs to reconsider its assumption that it would not be in the consumers interest to prioritise visual impact improvement funding applications in RIIO-2 and re-confirm its support for RIIO-2 and the £465m provision.

Yours faithfully,

A handwritten signature in black ink that reads "A Parsons". The signature is stylized with a large initial 'A' and a long, sweeping underline.

Andy Parsons
Chief Executive

A handwritten signature in purple ink that reads "M. A Connelly". The signature is written in a cursive style with a distinct loop at the end.

Mark Connelly
Land Management Lead