

## Evan Alaa

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**From:** Ruth Bradshaw <Ruthb@cnp.org.uk>  
**Sent:** 13 December 2023 16:56  
**To:** Evan Alaa  
**Subject:** Response to consultation on National Grid Electricity Transmission (NGET) North Wessex Downs – Visual Impact Provision Re-opener

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Dear Evan

The Campaign for National Parks is the only national charity dedicated to campaigning to protect, enhance and promote the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation's green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places which everyone has an opportunity to enjoy both now and in the future.

Protected Landscapes (National Parks and National Landscapes) are our finest landscapes with the highest level of protection and as champions of the National Parks we are keen to see that every opportunity is taken to conserve and enhance their wildlife, cultural heritage and natural beauty for future generations to enjoy. We have worked closely with other NGOs over a number of years to ensure that NGET is able to reduce the visual impact of existing overhead infrastructure in Protected Landscapes. This work led to the development of NGET's Visual Impact Provision (VIP) programme, and we have been a member of the VIP Stakeholder Advisory Group (SAG) since its inception.

We welcome and support Ofgem's decision to approve the VIP project in the North Wessex Downs National Landscape. The project has a great deal of local backing and has had the endorsement of the VIP SAG throughout the three years of its development. It is fully consistent with National Grid's VIP policy and provides a significant opportunity to enhance this part of the North Wessex Downs. The VIP programme has already delivered successful projects in Dorset National Landscape and the Peak District National Park. These projects will have a lasting legacy in the form of enhanced landscape character, visual amenity and tranquillity and this is something Ofgem should be proud of.

We are disappointed at the reference in the consultation to Ofgem being minded to reduce the funding for the project to £47 million, £14 million lower than NGET's funding submission. We understand Ofgem's responsibility to ensure that the project delivers good value for money for the consumer, but we are concerned that a reduction of this scale will pose a considerable risk to the delivery of the project. We ask you to reconsider this funding allowance as a matter of urgency and agree a funding proposal which is in line with those agreed for other VIP projects. NGET has assured the VIP SAG that the costs it has submitted for the North Wessex Downs Project are consistent with those for previous RIIO-T2 projects and the RIIO-T2 baseline.

We were also very concerned to read paragraph 5.22 of the consultation: "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."

NGET are absolutely clear that this is not their position and that they in fact plan to submit a funding application for a VIP project in the Cotswolds towards the end of 2024. As members of the VIP SAG, we have been monitoring the progress on this project over the last two years, including visiting the project site and hearing about the large amount of work that has already gone into stakeholder engagement, surveys and engineering design in the area. The wording in paragraph 5.22 therefore needs to be removed and the position regarding NGET's intention to bring forward the Cotswold VIP project as part of RIIO-T2 should be clarified.

Finally, we would like to remind Ofgem of the strong statutory and policy justification that led to the creation of this provision in the first place. Reducing the visual impact of electricity infrastructure allows both Ofgem and NGET to demonstrate that they are meeting their statutory duties towards Protected Landscapes and also helps meet various other responsibilities under environmental and electricity legislation. The duties relating to Protected Landscapes have recently been strengthened as a result of changes introduced as part of the Levelling Up and Regeneration Act 2023. These changes include amending the duty 'to have regard' to the statutory purposes of Protected Landscapes to a duty 'to seek to further' those purposes. This new duty comes into force on 26 December 2023 and means that the bodies to which it applies, including Ofgem and NGET, will need to do more to demonstrate how they are delivering the purposes of Protected Landscapes. This, therefore, makes it even more imperative that NGET are able to use the £465 million provision that has already been agreed as part of RII0-T2 to deliver successful projects and that a similar provision is agreed as part of future price control frameworks. There are still many more places in our Protected Landscapes that should benefit from the kind of schemes that are already having such a positive impact in Dorset and the Peak District.

Yours sincerely  
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*I work part-time, usually Monday to Wednesday.*

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