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Submission on behalf of the Visual Impact Provision (VIP) Stakeholder Advisory Group

06 March 2024

Response to Ofgem Consultation RIIO-3 Sector Specific Methodology for the Gas Distribution, Gas Transmission and Electricity Transmission Sectors

ETQ11. What are your views on retaining funding to support mitigation projects that reduce the visual impacts of existing infrastructure in designated areas?

I have chaired the National Grid's independent Stakeholder Advisory Group since it was established at the request of Ofgem in 2014. The *Visual Impact Provision* programme was created in response to strong encouragement from the UK environmental community and following the results of an extensive and convincing "willingness to pay" exercise.

In view of its undoubted success, the numerous examples of best practice and collaborative, stakeholder-led working, and the wider benefit that is now being demonstrated beyond the National Parks and National Landscapes, the Stakeholder Advisory Group strongly recommends the retention on the funding to support mitigation projects that reduce the impacts of existing infrastructure in designated areas in T3.

The Stakeholder Advisory Group comprises senior executives from leading government agencies including Natural England, Natural Resources Wales, Cadw and Historic England along with some of the UK's most influential non-government membership organisations including the National Trust, CPRE, the Campaign for National Parks, RSPB and the Ramblers. The National Parks and the National Landscapes are also represented, as are Ofgem and National Grid themselves. Remarkably, several of the individual representatives have remained personally involved throughout the past ten years, and we work alongside National Grid executives at the most senior level. I believe this is some measure of the value we all see in this Ofgem-driven initiative.

Collaboration for the wider good

The role of the Stakeholder Advisory Group is to provide authoritative guidance for the National Grid *Visual Impact Provision* (VIP) programme, and we have worked together successfully in some of the UK's most highly protected and best-loved landscapes. Considerable stretches of overhead line have already disappeared from iconic landscapes in the Peak District National Park and the Dorset National Landscape, and work is well under way in Eryri (Snowdonia) National Park, the Cotswolds and the North Wessex Downs.

In addition, significant and wide-ranging landscape and environmental enhancement continues to be facilitated through the VIP programme's small grants scheme – the Landscape Enhancement Initiative (LEI) – in dozens of protected landscapes across England and Wales from the Solway Firth to Cornwall and the Suffolk coast to Pembrokeshire. This initiative, after a faltering start, has gained momentum

significantly and there are growing numbers of exemplar LEI projects across the country. Not only have these projects boosted the resources and enabled work in many designated landscapes but they have also acted as a catalyst for collaborative working, involving landowners, farmers, ecologists, archaeologists, NGOs, enthusiastic volunteers and many members of local communities.

The case for continuation

I am writing on behalf of the Stakeholders Advisory Group, to make the case for continuing support for the Visual Impact Provision programme as an integral part of National Grid's work through the period under RIIO-T3 and, hopefully, beyond. The individual members of the Advisory Group, and the various government and non-government stakeholders that they represent, have voluntarily invested a great deal of time, knowledge and experience thus far, and we are all extremely keen to continue to work creatively together on these projects. Ofgem has not only been the instigator of this initiative – it has been an active and supportive participant. As the independent chair and as a professional environmental adviser to industry, Government and the charitable sector over several decades, I believe that the achievements have been, and continue to be, exceptional.

Through the VIP partnership we are:

- Transforming some of the nation's most iconic, well used and well-loved landscapes, and restoring them to their original natural beauty
- Encouraging innovation, mutual learning and environmental knowledge-transfer between sectors.
- Fostering skilful and sensitive engineering and aftercare over considerable (often 30-year) timeframes in some of the UK's most sensitive and challenging landscapes
- Enhancing the experience and in many cases, increasing access and understanding for the wider population to these designated areas. All this brings positive benefits for the health and wellbeing of the nation as a whole.
- Securing wide-scale opinion-leader endorsement for the work of National Grid and Ofgem's visionary approach in facilitating it.
- Maintaining the highest levels of stakeholder consultation and involvement throughout, bringing the benefits of experience and expertise from a national to a very site-specific level, and from professional specialists to knowledgeable local enthusiasts.
- Securing independent recognition for technical excellence in the fields of biodiversity net gain and nature conservation; archaeological investigation and protection; and community engagement. Our work together has been acknowledged through a number of industry-wide awards and is helping to set high standards for the future.

Maximising the opportunity for a lasting landscape legacy

In the next few years we believe that the VIP programme within National Grid has three particularly important roles to play:

1. It should continue with its original mission to restore some of the best loved landscapes in England and Wales to their original natural beauty. In some cases, this will be achieved by removing further stretches of overhead lines completely, and elsewhere the landscape will be

enhanced through practical environmental intervention, delivered through local partnerships via the VIP Landscape Enhancement Initiative.

This is set against the backdrop of the newly adopted changes to the treatment of protected landscapes in the Levelling up and Regeneration Act. As you will be aware, Section 245 changes what was the duty ‘to have regard’ to National Park purposes to a duty ‘to seek to further’ those purposes (and an equivalent change for National Landscapes). This means that all the public bodies and statutory undertakers to which it applies, including Ofgem and National Grid, have to do more to demonstrate how they are helping deliver National Park / National Landscape purposes. VIP and LEI are ideally placed to continue to achieve this.

2. VIP is a great source of inspiration and best practice for the teams at National Grid and their contractors as they now begin to work extensively outside the nationally protected landscapes. This is already proving to be highly beneficial as the new electricity transmission investment is being designed and implemented. The learning and best practice from VIP in areas such as technical innovation, environmental management and community engagement is already influencing the planning, design and construction of the new infrastructure. This is at a time when there is greatly increased national and international commitment to nature recovery, landscape enhancement, nature-based carbon capture, the employment of ecosystem services and to deep-rooted community engagement.
3. In late 2023 the UK was formally acknowledged in the Government’s “State of Nature” review to be the most nature-depleted country in Europe. Ofgem’s VIP programme is perfectly placed and already set to inform the country’s most extensive landscape intervention of the past half-century and secure a world-class living legacy for the UK. Through VIP the National Grid and the Stakeholder Advisory Group together have the ability to deliver an electricity transmission network that will facilitate the move to renewable energy whilst at the same time achieving exceptional and timely associated environmental and community benefits and a lasting, living landscape legacy.

As a Group, we have discussed supply chain and resource issues with National Grid and the impact further VIP projects could have. We know that National Grid will respond in depth to this point but, we consider, that a proportionate number of VIP projects and the LEI initiative can reasonably be accommodated within current resources.

4. The model that Ofgem initiated with the VIP programme and its associated independent Stakeholder Advisory Group is now well proven. Although this programme is still evolving and improving, the levels of mutual trust and understanding and ability to work collaboratively do, we firmly believe, demonstrate that a similar approach to major infrastructure management would benefit other regulated industries. I believe from my own past experience, that the water industry would find it particularly beneficial. We sincerely hope that our work of the past ten years will continue with Ofgem and National Grid, and that Ofgem’s innovation will serve to inspire similar stakeholder success elsewhere. The members of the Stakeholder Advisory Group would welcome the opportunity to endorse this way of collaborative working in approaches with Ofgem to their colleagues among the other state regulators.

The breadth and depth of independent advice which VIP and its Stakeholder Advisory Group provide for National Grid and for the wider community has never been more important, and we sincerely hope that Ofgem will continue to give it all the support that it deserves.

A model of best practice

In conclusion, the Ofgem initiative of 2013 / 14 of which VIP is part is widely seen as “groundbreaking” and the experience gained is now influencing the new electricity infrastructure investment in a variety of very positive ways. With the help of the Stakeholder Advisory Group, National Grid is now demonstrating an exceptional ability to listen and to learn from experts and local communities alike. This in turn is being shown to deliver increased efficiency, smoother delivery and greater “customer satisfaction.” The VIP projects are widely recognised as valuable demonstrations of best practice, and our work with National Grid can and should serve as a role model for other industries.

Professor Chris Baines
Chair of the independent Stakeholder Advisory Group
National Grid

06 March 2024

For a full list of Stakeholder Advisory Group members please see an appendix to this submission on the next page.

Appendix - National Grid - National Stakeholder Advisory Group

Membership as at 06 March 2024

Name	Title	Organisation
Chris Baines	Independent environmentalist and broadcaster	Chair
Ashley Batten	Regional Inspector of Ancient Monuments	Cadw
Ruth Bradshaw	Policy Officer	Campaign for National Parks
Roger Mortlock	Chief Executive	CPRE – The Countryside Charity
Llinos Price	Policy & Community Affairs Manager	Campaign for the Protection of Rural Wales
Ian Morrison	Director of Policy & Evidence	Historic England
Vacancy		The Landscape Institute
Howard Sutcliffe	Manager Clwydian Range & Dee Valley National Landscape	National Landscapes Association
Sarah Kelly	Landscape Architect, New Forest National Park Authority	National Parks England
Jonathan Cawley	Director of Planning & Land Management	Eryri National Park Authority
Dr Ingrid Samuel	Placemaking & Historic Environment Director	National Trust
Mike Burke	Director, Sustainable Development	Natural England
Ruth Jenkins	Head of Natural Resources Management Policy	Natural Resources Wales
Stephen Russell	Policy Officer	Ramblers
Alun Prichard	Director	RSPB Cymru