

Response to Ofgem RIIO-3 Sector Specific Methodology Consultation

March 2024

1. Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire action for wilder, inclusive National Parks. We have been campaigning for over 80 years and our independence from Government means we can speak for National Parks when no-one else can.
2. We have a long-standing interest in the price control process having been closely involved, alongside other environmental NGOs, in the development and implementation of the visual amenity allowances for both electricity and distribution operators. This response starts with some general comments about the importance of giving specific consideration to National Parks in the RIIO-3 Framework. We then set out our response to the specific consultation question relating to mitigating visual impacts in RIIO-ET3.
3. Our comments focus primarily on National Parks in line with our remit. However, many of the points we raise would also apply to National Landscapes (formerly known as Areas of Outstanding Natural Beauty (AONBs)).

General comments

4. Campaign for National Parks' vision is for nature-rich Parks for all. We are keen to ensure that the natural beauty of these special places is conserved and improved for everyone to enjoy both now and in the future and we, therefore, want to see as much as possible done to reduce the visual impact of transmission infrastructure in National Parks. Ofgem must also take this issue very seriously in line with its environmental responsibilities under the Electricity Act 1989 and its statutory duties relating to the purposes of Protected Landscapes (National Parks and National Landscapes).
5. These latter duties were recently strengthened, making it even more imperative that the bodies to which they apply (which includes both Ofgem and statutory undertakers such as National Grid) take appropriate action to support the purposes of Protected Landscapes. Changes set out in Section 245 of the Levelling Up and Regeneration Bill 2023 mean that the previous duty 'to have regard to' the statutory purposes of National Parks is now a duty 'to seek to further' these purposes. Campaign for National Parks has obtained legal advice which makes it very clear that the bodies to which these duties apply must now take a much more proactive and thorough approach to demonstrating how they are seeking to further the statutory purposes. Natural England's interim advice also makes it clear that the new duty is significantly stronger than the previous duty 'to have regard to' the purposes¹.

¹ For details of Natural England's advice, see for example, this response to the Development Consent Order for the A66 Trans-Pennine Project: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010062/TR010062-002418-Natural%20England.pdf>

Response to consultation question

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

6. **Funding to support mitigation projects that reduce the visual impacts of existing infrastructure in National Parks must be retained.** There is a very strong case for this funding and a high level of support for removing electricity infrastructure from Protected Landscapes as demonstrated by a number of different studies relating to both transmission and distribution operations. This includes the 2018 [‘acceptability’ survey](#) undertaken by National Grid for RIIO-T2 which identified that two-thirds of bill-payers find it acceptable for the cost of visual amenity projects to be passed on to consumers. Furthermore, paragraph 2.11.5 of EN5, the Electricity Networks National Policy Statement² sets out a general presumption in favour of the use of undergrounding rather than overhead lines in Protected Landscapes.
7. It is essential that the RIIO-3 Framework retains a provision for TOs to reduce the visual impacts of existing infrastructure. While much has already been done to reduce the visual impacts of electricity infrastructure, there are still many more parts of our National Parks which could benefit from the removal of overhead lines. The long-term goal for visual amenity should be that, where practically feasible, all existing distribution and transmission lines run underground through designated landscapes and their settings, and that new lines run underground through these areas or avoid them altogether, in line with paragraph 2.11.5 of EN5.
8. The visual amenity allowance for distribution lines which was first introduced in the 2005-2010 price control period, has already delivered many significant improvements. The scheme for transmission lines was introduced more recently but the improvements that have been delivered to date, both through the major projects and through the smaller-scale measures supported by the Landscape Enhancement Initiative, have had a huge impact on visual amenity and are much valued by both local communities and the visitors to these areas, as well as making a positive contribution to nature recovery. The Peak East VIP project delivered a Biodiversity Net Gain of 18% and was highly commended for a national biodiversity award. National Grid are now applying what they have learnt from this, and other VIP projects to future new-build projects, thus ensuring even greater benefits are delivered as a result of the funding for visual amenity.
9. Retaining the existing scheme will maximize the benefits from the preparatory work that has already been undertaken and there is huge potential to build on the work that has been undertaken to date during future price control periods. For example, National Grid commissioned extensive research to assess the landscape and visual impacts of all the overhead transmission lines in Protected Landscapes in England and Wales. There is also strong support for this work as demonstrated by the time commitment that we, and other organisations, are making to support this work through our involvement in the Stakeholder Advisory Group (SAG) for National Grid’s Visual Impact Provision (VIP) programme. It is essential that full value for money is achieved from all the resources that have already gone in to establishing the scheme.

² <https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5>

10. We understand that National Grid intend to repeat their consumer willingness-to-pay research for RIIO-T3 on a non-route specific basis as they did for RIIO-T2, and will submit this alongside their Business Plan later this year. However, it will not be possible for them to have 'taken the views and priorities of local communities into account in reaching their visual mitigation proposals' at this point. They will only be able to undertake route specific research for T3 projects once the provision for T3 has been agreed and there is more certainty about the scale of funding available, and, therefore, which projects are likely to be included. In our experience as members of the VIP SAG, National Grid make a lot of effort to engage effectively with local communities and take their views into account when designing specific projects. For example, we are aware that in response to input from local communities National Grid redesigned the headhouses for the Eryri project and amended the sealing-end compound location and approach to ecology in the Peak East project.
11. Consideration should also be given to the growing body of evidence about the value of National Parks to the rural economy. For England alone, there are nearly 100 million visitors to the National Parks and surrounding areas each year spending more than £5.5 billion between them³ and supporting thousands of jobs. Many of these visitors are specifically attracted to these areas by the natural beauty of the landscape.
12. We would also like to comment on the reference in the consultation to a constrained supply chain. Again, from our involvement in the VIP SAG, we are aware that this is something that National Grid has given careful consideration to throughout the development of the VIP programme, and in the planning of projects. For example, by phasing delivery to enable a new project to start as an existing one concludes. It should also be noted that the VIP programme is helping address the wider challenges of securing 'net zero' in a number of other ways. For example, some of the existing VIP projects, including in Eryri, have been designed to deliver uprated cable circuits which facilitate the connection of new generation, including the renewable generation required to achieve 'net zero'. Another example is that National Grid are undertaking initiatives in conjunction with the delivery of VIP projects aimed at inspiring interest in studying STEM (Science, Technology, Engineering and Mathematics) subjects in local education establishments, thus supporting the creation of the engineers of the future.
13. Finally, we would like to express our strong support for the Landscape Enhancement Initiative (LEI) which has enabled the funding of a number of smaller-scale improvements aimed at shifting emphasis away from the visual impact of existing infrastructure through measures such as regenerating hedgerows, repairing footpaths and tree-planting. LEI measures have made a significant and positive contribution to the natural beauty, wildlife, cultural heritage and public enjoyment of Protected Landscapes and have been very well-received by local communities.

We are happy for this response to be made publicly available. Please contact Ruth Bradshaw (email: ruthb@cnp.org.uk) if you would like further information about any of the points raised in this response.

³ <https://committees.parliament.uk/writtenevidence/10706/pdf/#>