



**National
Trust**

Reopener Consultations
Ofgem
sent via email

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28 April 2026

Dear Ofgem

**RE: RIIO-2 Visual Impact Mitigation Re-opener: National Grid Electricity
Transmission's Cotswolds project**

We are writing in response to the consultation on the Ofgem Draft Determination of National Grid Electricity Transmission's Visual Impact Mitigation Re-opener application for its Cotswolds Visual Impact Provision (VIP) project and Ofgem's indication that it is minded to reject the project funding request. We appreciate the opportunity to offer observations for consideration.

With our staff, members, volunteers and supporters, the National Trust is the biggest conservation charity in Europe. We protect and care for places so people and nature can thrive. Many millions share the belief that nature, beauty and history are for everyone. So we look after the nation's coastline, historic sites, countryside and green spaces, ensuring everyone benefits. For everyone, for ever.

The National Trust has had a long involvement with the Visual Impact Provision programme as a targeted mechanism to address the most significant adverse effects of existing electricity transmission infrastructure within nationally protected landscapes. The Cotswolds is one of the most valued landscapes in England, and the presence of overhead lines in this location continues to affect its natural beauty, cultural significance and public enjoyment.

We recognise that the policy context in which VIP programme was conceived has evolved, with increased emphasis on affordability, proportionality and the pace of delivery of energy infrastructure. Our comments are therefore not intended to challenge that broader direction, but to highlight specific aspects of this proposal which we consider relevant to the final decision.

Advanced stage and maturity of the proposal

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The Cotswolds VIP project is extremely well developed having progressed since 2020, informed by experience from earlier schemes and supported by technical assessment and stakeholder engagement. The project represents a comparatively mature opportunity to deliver defined landscape benefits in a sensitive location.

We also note that the proposal has been developed alongside plans to uprate the existing transmission infrastructure, allowing mitigation works to be considered in tandem with wider network activity. This coordinated approach can help reduce overall disruption and represents a pragmatic use of the opportunity presented by works already being undertaken. Opportunities of this nature may not arise frequently, and it is therefore relevant to consider the potential benefits in that context.

Funding and impact on consumers

The project would not be funded through general taxation, but through the Visual Impact Provision within the RIIO price control framework, with costs recovered via consumer bills. This mechanism has been used to support mitigation of visual impacts in protected landscapes, informed by stakeholder engagement and evidence of willingness to pay.

We recognise the importance of affordability in current decision-making. At the same time, the Trust considers it important that assessments also reflect the long-term and enduring nature of the impacts being addressed. The effects of existing infrastructure in protected landscapes are experienced over many decades, and the benefits of mitigation, where delivered, are similarly long lasting.

Landscape and local economic benefits

The section of overhead line affected passes through the Cotswolds National Landscape and is experienced from a range of viewpoints, public routes and heritage assets. Its removal would result in a lasting positive change to the wider landscape character and visual amenity, with associated benefits for recreation and the local economy.

We also recognise that not all of these benefits are readily captured through standard appraisal approaches. Elements such as landscape quality, heritage setting and sense of place can be difficult to quantify, and may not be fully reflected in value for money assessments. It is therefore important that these factors are considered alongside quantitative analysis.

The Trust also notes the strengthened duty introduced under Section 245 of the Levelling-up and Regeneration Act 2023, which requires relevant public bodies to seek to further the purposes of Protected Landscapes. While the application of this duty in the context of economic regulation requires careful interpretation, it signals the Government's broader expectation that decision-making should support the conservation and enhancement of

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these areas. In this context, it would be helpful to understand how this objective has been taken into account.

Proportionality in a changing context

We acknowledge that expectations around delivery, engagement and proportionality are evolving, and that future infrastructure proposals will come forward under different policy and regulatory frameworks. In that context, we do not consider that this project should necessarily be seen as a model for future schemes. Rather, it represents the completion of a programme developed under an earlier approach of the RIIO-2 business plan (2021-2026), and the assessment should reasonably take that into account.

Public confidence

Visible efforts to reduce the impact of existing infrastructure can play a role in maintaining public confidence in the wider energy transition, particularly against the backdrop of significant investment through the Great Grid Upgrade programme. The VIP programme has contributed to this by demonstrating that infrastructure can be managed sensitively within nationally important landscapes.

In conclusion, the National Trust considers that the Cotswolds project aligns with the type of intervention the Visual Impact Provision was intended to support. While recognising the importance of affordability and proportionality, we encourage Ofgem to ensure that decisions also reflect the long-term public value of landscape enhancement and the purpose of the VIP mechanism.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ingrid Samuel', with a stylized, cursive script.

Dr Ingrid Samuel OBE
Heritage Planning and Strategic Partnerships Director
National Trust

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