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To whom it may concern.

re: Consultation RIIO-2 Visual Impact Mitigation Re-opener Draft Determination: National Grid Electricity Transmission's Cotswolds VIP Project

Historic England does not support Ofgem's assessment of NGET's visual impact mitigation re-opener application for its Cotswolds VIP project and Ofgem's proposal to reject NGET's application.

NGET's preferred option (Option 3) to replace 94% of the of the existing 400kV Feckenham – Walham and Feckenham – Minety double circuit overhead electricity transmission line with uprated overhead line and to only underground the remaining 6% through the most sensitive area of the Cotswolds National Landscape comprised a pragmatic and balanced response to the challenges of installing the infrastructure the country needs whilst conserving our most cherished landscapes. The Cotswolds VIP project provided an excellent opportunity to improve the National Landscape in this area, arrived at through an established partnership between the UK's leading landscape, heritage and nature charities, the key landscape NDPBs of England and Wales (including Historic England), and National Grid.

The National Landscapes are special places designated because of their landscape values, covering approximately one quarter of the land area in England. The Cotswolds National Landscape has been shaped by millennia of human activity which has left traces in the field patterns, routeways and archaeology. The undergrounding of a 7.4km section of overhead lines would not only have improved the experience of that landscape but also greatly enhanced the setting of one of the area's most famous archaeological sites – Belas Knapp Long Barrow, a particularly fine example of a rare Neolithic structure, and one of the first monuments to be officially designated as a scheduled ancient monument over 100 years ago. Views currently from this long barrow include pylons and overhead lines. Their removal would have enabled

people to once more view and appreciate the 5,000-year-old monument in a more rural landscape context unencumbered with modern infrastructure.

Ofgem's assessment of the benefits and costs of NGET's proposals take no account of the Treasury's supplementary guidance to the Green Book (2021) covering the consideration of wellbeing impacts into Cost Benefit Analysis. [Research](#) conducted as part of the DCMS Culture and Heritage Capital Programme, and undertaken in accordance with the Treasury's supplementary guidance, estimates the wellbeing value each person gains on average from their local heritage to be £515. This equates to an estimated national wellbeing value of everyday encounters with cultural heritage of £29 billion annually. The research developed an approach whereby economic, social and cultural values are assessed equally to provide robust evidence base for decision-making. Historic England believes a similar approach could have been applied as part of Ofgem's Cost Benefit Analysis to fully assess the public benefits of the proposals.

If a new overhead line was proposed in this location now, Historic England would be seeking mitigation through design to avoid harming the significance of Belas Knapp Long Barrow through a change in its setting.

Historic England, however, is pleased to note that the National Landscape has been successful with several applications to the Landscape Enhancement Initiative, which will help to mitigate to a degree some of the impacts of the overhead lines.

We also recommend that the knowledge gained from the successful integration, through the VIP programmes, of new infrastructure with landscape heritage and nature continues to be applied across the Great Grid Upgrade programme. The Cotswolds VIP project has the potential to contribute further information and understanding that would be helpful in this regard.