

RlIO-2 Visual Impact Mitigation Re-opener Draft Determination: NGET Cotswolds VIP Project – Consultation responses

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We received 17 non-confidential responses to our Draft Determination for NGET’s RlIO-2 Visual Impact Mitigation Re-opener for the Cotswolds VIP Project, from a range of stakeholders. This document sets out the responses received by email. Responses explicitly marked as confidential have been excluded.

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Natural England

Dear Ofgem,

Thank you for seeking views via this consultation. This is the response from Natural England.

Natural England is not able to state a preference between the funding options based on the information presented in the consultation, which does not include an environmental assessment covering all relevant environmental topics. However, we seek assurance from Ofgem that due account is being taken of relevant legislation and policy relating to protected landscapes and energy networks. We therefore wish to highlight the following:

- [Section 245 \(Protected Landscapes\)](#) of the Levelling-up and Regeneration Act 2023 (LURA), which requires relevant authorities to seek to further the statutory purposes of National Landscapes.
- [Schedule 9](#) of the Electricity Act 1989, which places a duty on all transmission licence holders, in formulating proposals for new electricity networks infrastructure, to “have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and ...do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.
- The National Policy Statement for Electricity Networks ([NPS EN-5](#)), which sets out that where harm to the landscape, visual amenity and natural beauty of National Landscapes cannot feasibly be avoided by re-routing overhead lines, the strong starting presumption will be that the applicant should underground the relevant section of the line. However, undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes is not outweighed by its corresponding landscape, visual amenity and natural beauty benefits.

Thanks,

Sharon Woodruff

Principal Officer

Planning and Infrastructure, Strategy and Government Advice,

Natural England, Wayfaring House,

Kendal, LA9 7RL, 07717 463998

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Cheltenham Borough Council

Good morning,

I am writing on behalf of Cheltenham Borough Council further to learning that Ofgem has published a *mined* to position not to fund the Cotswolds VIP project. While we appreciate the clarity provided at this stage and the opportunity to comment via this consultation, the Council is disappointed to learn that the project is unlikely to proceed.

As you will be aware, considerable time, effort and finance have been invested in developing proposals that would have delivered substantial landscape and environmental enhancements within the Cotswolds National Landscape. This is one of the UK's most distinctive and cherished protected areas, designated for its exceptional natural beauty, rich historic environment, and unique limestone scenery.

Should funding ultimately be withdrawn, we respectfully request that all alternative avenues for delivering the scheme are fully explored. Many partners, stakeholders, and communities have supported the project to date, and we are keen to ensure that the benefits envisaged are not lost.

We await Ofgem's final decision this summer and would welcome any further updates as they become available.

If you require any additional input from Cheltenham Borough Council, please do not hesitate to contact me.

Kind regards

Tracey Birkinshaw

Director of Community & Economic Development

Cheltenham Borough Council

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Withington Parish Council

Dear OFGEM,

We write in strong opposition to Ofgem's minded-to position not to fund the Cotswolds Visual Impact Provision (VIP) project. We urge Ofgem to reverse this decision before its final determination, and set out below a case founded on legal duty, environmental obligation, economic value, public interest, and the weight of investment already committed by all parties:

- **Ofgem Is Subject to a Legal Duty to Protect This Landscape** – Under the Electricity Act 1989, Ofgem has a statutory duty to have regard to the impact of its activities on the environment. This obligation is not discretionary; it is a legal baseline against which all funding decisions must be tested. That duty has been materially strengthened since the VIP programme was established. Section 245 of the Levelling-up and Regeneration Act 2023 amended the duty on relevant authorities in respect of Protected Landscapes, replacing the previous requirement to "have regard to" their purposes with a stronger obligation to actively "seek to further" those purposes. The new duty is active rather than passive and relevant authorities are now expected to proactively take steps to conserve or enhance the special qualities of the National Landscape, going beyond mitigation or like-for-like measures, and must be able to demonstrate openly how they have done so. Declining to fund this project, without a credible alternative pathway to landscape restoration, represents a failure to meet this duty. CPRE has stated that Ofgem's decision ignores both public support for undergrounding and its own duty to conserve and enhance protected landscapes
- **The Cotswolds Has a Disproportionate Burden of Pylons** – The Cotswolds National Landscape is the largest of all AONBs in England and Wales, spanning 790 square miles, and has more pylons than any other protected landscape in England and Wales. This is not a minor visual inconvenience; it is a structural legacy from a pre-designation era that actively undermines the purpose for which the Cotswolds National Landscape exists. Independent landscape and visual impact research identified the Cotswold Plateau as one of the landscapes most affected by pylons anywhere in England and Wales. The proposed scheme targets precisely the most impactful section: the line running from Postlip Mill to the edge of the Cotswold Plateau above Dowdeswell reservoir, which closely follows the Cotswold Way National Trail, significantly affecting views for residents, visitors, users of the trail, and those visiting Belas Knap long barrow and Cleeve Common
- **Planning Consent Has Been Granted** – This is not a speculative proposal. Planning permission has been granted by both Cotswold District Council and Tewkesbury Borough Council, and all other necessary consents are

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in place. The project is awaiting only confirmation of Ofgem funding and finalisation of legal processes before work can begin. Refusing to fund it at this stage, after the most resource-intensive stages of development have been completed, is an extraordinary waste of the regulatory and public investment already made. The decision follows almost five years of consultation, representing a significant commitment of time and resource by local communities, statutory bodies, partner organisations, and National Grid itself. Abandoning the project now, without any alternative mechanism for landscape restoration, renders all of that investment worthless and betrays the good faith of everyone who participated

- **The VIP Fund Was Expressly Designed for This Purpose –** The VIP programme was established by Ofgem following a customer willingness-to-pay study commissioned in 2003, which demonstrated public appetite for undergrounding in protected landscapes and in seeking to deliver on their environmental obligations, £500 million was set aside to mitigate the visual impact of existing electricity infrastructure in nationally protected landscapes. An independent process was established, approved by Ofgem, to assess 571 kilometres of electricity transmission line in AONBs and national parks, and identify which sections have the highest visual impact, using technical experts, local stakeholders, and communities, to recommend priority schemes where replacing the overhead line with underground cabling could have a transformative effect. The Cotswolds was identified through this rigorous, independent process as one of those priority schemes. Refusing to fund it undermines the integrity of the very methodology Ofgem approved
- **Proven Precedent Demonstrates This Is Deliverable –** Underground burying of transmission voltage lines in protected landscapes is not experimental. VIP projects have already been completed in Eryri National Park, the Dorset National Landscape, and the Peak District National Park, with work also underway in the North Wessex Downs National Landscape. Each has delivered permanent landscape restoration. The Cotswolds project is the same in scope and ambition and carries planning consent that its predecessors in some cases did not enjoy at the equivalent stage
- **The Benefits Are Substantial, Lasting, and Cannot Be Revisited –** The case for the project rests not only on visual amenity, but on a broad range of interconnected public benefits:
 - **Health & Wellbeing –** The last few years have been a reminder that protected landscapes and AONBs are critically important for the health and wellbeing of the nation. Improving their quality is a public health investment as much as an environmental one
 - **Irreversibility of Inaction –** If the project does not proceed, the pylons will remain indefinitely. There is no alternative funding mechanism currently

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proposed that could deliver equivalent landscape restoration. This is a once-in-a-generation opportunity whereby if the window closes, it is almost certainly permanent

- Landscape & Heritage – The removal of 16 pylons and 7 kilometres of overhead line would deliver a permanent and transformative improvement to one of England's most visited protected landscapes, enhancing views from the Cotswold Way National Trail and restoring the setting of nationally significant heritage sites including Belas Knap long barrow and Cleeve Common
- Resilience – Underground cables are less vulnerable to damage from severe weather conditions including lightning, high winds, and ice storms, and pose no hazard to low-flying aircraft or wildlife. They offer long-term operational resilience that overhead lines do not
- The Cost Argument Does Not Withstand Scrutiny – Ofgem's primary justification is the protection of billpayers during a period of rising energy costs. We acknowledge that concern, but it must be weighed properly. The VIP fund was established precisely because the public, through the willingness-to-pay research, demonstrated that they did value landscape restoration and were prepared to support its cost. Ofgem accepted that finding and created the fund accordingly. To reject the project now on cost grounds, without new evidence that public values have materially changed, represents an inconsistency in regulatory reasoning. Furthermore, the cost of this project, spread across all electricity consumers nationally, is marginal in per-household terms, while the benefit which provides a permanent improvement to one of England's great protected landscapes, is shared by millions of residents, visitors, and future generations. A narrow short-term calculation of consumer cost does not capture the full public value at stake

We urge Ofgem to reconsider its minded-to position and confirm funding for the Cotswolds VIP project. The legal framework has strengthened since this programme began. The project has cleared every regulatory and planning hurdle placed before it. The landscape case is compelling, independently verified, and commands broad public support. And the window to act will not reopen. Declining to fund this project would be legally questionable, environmentally damaging, and a profound breach of faith with the communities, landowners, and organisations who have invested years in its development. We call on Ofgem to fulfil both the letter and the spirit of its duties to England's protected landscapes.

Kind regards

Parish Clerk of Withington Parish Council
Incorporating Cassey Compton, Foxcote, Hilcot & Withington
www.withington-gloucestershire.co.uk

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Knight Frank - Rural Consultancy

Dear Evan,

Jonathan Stanley is happy for his support to the OFGEM decision to reject the funding to be published alongside the final decision.

Kind regards

Tim

Tim Broomhead MRICS FAAV

Partner

Rural Consultancy

Professor CHRIS BAINES

The national importance of Ofgem approval for National Grid’s Cotswolds VIP project

Introduction

I have served as chair of the Independent Stakeholders Advisory Group since its establishment in 2013. This is an Ofgem-driven initiative which is working exceptionally well. Cancellation of the Cotswolds Visual Impact Provision (VIP) project is seen by stakeholders as a very severe setback, just at a moment when our work together is about to have its greatest impact. Therefore, I am writing to urge Ofgem to **reverse its rejection** of the Cotswolds undergrounding VIP project. The scheme is expected to add considerably less than 20 pence per annum to customer bills, but its value as a model project in the context of the £60 billion Great Grid Upgrade will be enormous. Conversely, if cancelled this would deliver a very serious blow to the collaborative working that Ofgem and the VIP programme have been strengthening over the past twelve years. It would also conflict with the obligation placed on both the regulator and the energy distribution company, actively to further the purposes of nationally protected landscapes.

Origins of the Visual Impact Provision (VIP) programme

I am well aware that the corporate memory in many organisations can be alarmingly short. It is therefore worth reminding Ofgem that the Visual Impact Provision programme was initiated by the energy regulator in response to the government’s declared requirement for regulated industries, national public bodies and the regulators themselves, to have regard for the statutory purposes of protected landscapes. Subsequently that government directive has been strengthened considerably, and there is now a requirement under Section 245 of the Levelling Up and Regeneration Act (LURA) 2023, *actively to further* those objectives. This strengthening of the legislation has been triggered partly in response to the official recognition that the UK is now the most nature-depleted country in Europe. Until Ofgem’s “minded to refuse” pronouncement, the VIP programme had been regarded nationally and internationally as an exemplary response to that requirement.

The VIP program was also a response to well-informed pressure from the UK’s leading countryside and conservation charities – most notably the Campaign to Protect Rural England (CPRE) and the Campaign for National Parks (CNP). The scale and focus of the program was subjected to independent “willingness to pay” exercises and the public support has been extremely positive throughout. With each successive project the customer support has been revisited and reconfirmed and that rigor certainly applied to the Cotswolds VIP project.

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In the period since 2013, the political and public recognition of the value of accessible and enriched countryside has increased considerably. In terms of customer value, it is the role that the landscape plays in public health and well-being, both physical and mental, that underpins the investment in VIP. It is also very clear that local opposition to much of the proposed new energy infrastructure lies in communities' determination to protect the local landscape. The VIP programme is developing and demonstrating ways of working which can offer reassurance. The projects are all, by definition, in particularly popular and precious landscapes – the Peak District, the Dorset Downs, North Wessex Downs, Eryri in North Wales, and now the Cotswolds National Landscape. Through the VIP programme, National Grid and its contractors are refining the practical techniques that will enable them to work more skilfully and sympathetically with sensitive landscapes and communities in the future.

National Grid has benefitted very considerably from the high level of experience, expertise and endorsement that continues to be provided voluntarily by the 15 national stakeholder organizations. This is a unique partnership between Non-Departmental Public Bodies (NDPBs) in England and Wales; national land-management membership organization in the charitable sector (NGOs) that collectively represent more than 7 million supporter families; the National Grid and Ofgem. All parties recognize and value the level of mutual trust and shared learning, and it is very difficult to understand how Ofgem is prepared to jeopardise the strength of that partnership and its proven progress, just at the moment when its shared values offer such practical benefit to the enormous programme of landscape and community impact that lies ahead.

The benefits at risk though cancellation of the Cotswolds VIP project

- **Accessible countryside:** The Cotswolds National Landscape is recognised as one of the most popular rural areas in England. It is also central to the local economy. The line of pylons to be removed have dominated the skyline, and overpowered the Cotswolds Way National Trail, as well as the open-access and very popular Cleeve Common, for more than half a century. Undergrounding the powerlines would be visually transformational, and the project is designed to highlight the archaeological and ecological richness of the area.
- **Local stakeholders:** Almost six years of painstaking work by a large team of National Grid staff and their specialist advisers has built an exceptional level of local support and appreciation for the scheme. Trust has been hard-won with farmers and landowners, the regional tourism industry, local councils and the many people who use the landscape. If the scheme is cancelled, then the reputational damage locally, for Ofgem, National Grid and its key stakeholder organisations will be very considerable.
- **National Stakeholders:** For the past twelve years, the national stakeholder organisations that were invited by Ofgem to serve as independent advisers on the VIP programme have shown exceptional levels of commitment. They have

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risked their reputations and given freely of their technical knowledge, their professional judgement and their public endorsement for the innovative and collaborative approach to the VIP. In many cases the stakeholders have been represented at chief executive or similar senior level, and National Grid has responded with equally senior executive input. That level of dedication was requested by Ofgem in acknowledgement of the national importance of the country's protected landscapes. That commitment could be seriously jeopardised if Ofgem now chooses to disregard the independent specialist advice of the stakeholders.

- Great Grid Upgrade:** As you know, the UK energy industry is embarking on the most extensive and disruptive intervention into the rural landscape and coastal waters for more than half a century. Thousands of square miles and hundreds of communities are about to be subjected to unavoidable impact. Through the VIP programme, stakeholders, National Grid and their contractors are refining techniques for sensitive landscape change and sympathetic community engagement. This way of working is being widely applauded and is intended to inform the way that the huge programme of new and upgraded electricity infrastructure is implemented into the future. The Cotswolds scheme is the latest element in that learning and modelling continuum. Its cancellation would severely damage that process, and could signal to the company and the contractors, that this more environmentally sensitive way of working need not be taken seriously. That would reflect very badly on the regulatory process and its regard for the statutory obligation “actively to further the purposes of nationally protected landscapes.”

Finally

The Cotswolds VIP project is not merely a one-off cable-undergrounding exercise. It has a key role to play in informing the way that National Grid, its contractors and others deliver the Great Grid Upgrade over coming decades. It is testament to the merits of cross-sectoral partnerships and co-operative working, and it is a credit to Ofgem's vision of 12 years ago. That early vision deserves to be respected.

The preparatory work has been completed over six years, with input from Grid executives and expert contractors, and the scheme is “shovel-ready”! By adding less than 20p per annum to individual energy bills, I believe the Cotswolds VIP scheme, and the lasting influence it will have, represents exceptionally good value for customers and the country. I sincerely hope that the regulator will confirm approval of the scheme without delay.

Professor CHRIS BAINES, Hon FCIWEM, FRI Biol.

Independent Chairman, National Grid/Ofgem Stakeholders Advisory Group

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(Hon Patron, Countryside Management Association; Hon Vice President, Royal Society of Wildlife Trusts, RSPB lifetime medallist, member of National Trust's Natural Environment Advisory Group, award-winning writer and broadcaster; landscape architect.)

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Philip Hackett

Dear Amardeep,

Thank you for your email about the update on the Cotswold Visual Impact Provision (VIP) project. The BHS are sorry to learn that currently the funding has stopped for the removal of the overhead transmission line and pylons will remain in place. However, should the funding be found in the future for this important project, please could you contact the British Horse Society so that we can respond to the consultation as there are significant potential access gains to be made using the haul routes for cables between Postlip and the area of Charlton kings where the cables will be underground. If our previous submission to the original consultation could be kept onfile I would be very grateful as it will provide a starting point for future submissions and negotiations with land owners should the project be reinstated at a later date.

Kind regards,

Philip Hackett

British Horse Society Access Field Officer - southwest
02476 840515 | 07783888285

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David Byne

Dear Sirs

I am responding to the above consultation as a concerned member of the public living close to the subject area. I strongly support NGET's Cotswolds VIP Project and urge that you approve the project as proposed. I do NOT agree with your proposal to cancel the project.

For over 50 years I have lived on the edge of Cheltenham. I know the area affected by the project very well as I take frequent and regular walks on Cleeve Common, the Cotswold Way or both. This weekend when on Cleeve Common, from a number of locations I was able simultaneously to see at least 10 of the pylons which would be removed under the project.

They and the power lines form the middle distance Easterly view covering an arc approaching 180 degrees. They form a seriously damaging feature of what is otherwise a highly prized and protected rural environment. Erecting such power lines would not be acceptable today.

This part of the Cotswold escarpment is close to Cheltenham and is widely frequented for recreational purposes. It is part of the Cotswold Natural Landscape (formerly AONB) and as such is not only protected but is a landscape the government has charged itself with enhancing. The power lines roughly follow the line of the Cotswold Way, a designated National Trail which deserves the highest environmental standards.

This project was chosen by National Grid in consultation with a wide range of interested parties as the next high priority area for environmental improvement under this government-promoted scheme. It would therefore be more than just a great disappointment should it not go ahead but it would call into question - not for the first time - the government's commitment to its own policy for environmental improvement. This is at a time when the UK has been identified as a country which has suffered a worrying level of environmental and ecological degradation.

I have studied the case made by Ofgem for cancelling the project. This contains gross generalisations about affordability and fails entirely to justify why the project is no longer cost-effective. Moreover it fails to take into account the considerable amount of time, effort and no doubt costs (though these are not made available) that have already been expended on getting the project to its present state.

Hence, should this project be discontinued, it would:

1. Be against the governments own statutory commitments
2. Undermine public and institutional faith in the governments commitment to environmental policies

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3. Be without any clear, objective and justified reasons for not proceeding
4. Waste the resources already expended in advancing the project to date.

I therefore urge you to approve the Cotswold VIP Project as currently proposed.

David Bayne

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Jill Baptist

Hi - I would like to communicate my very strong support for the removal of overhead pylons in the Cotswolds AONB

There are many in our area of Chedworth and surrounds and they create a significant blight on what is an otherwise beautiful landscape - plus they are jarring when viewed next to historical stone buildings.

Best wishes

Veronica Baptist

Sent from my iPhone

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Mrs Waren

Ofgem - To Whom It May Concern

Thank you for the opportunity to give direct feedback regarding your decision on the National Grid's plans for putting new electricity cables underground in the Cotswolds.

I live in the nearby village of Andoversford and have lived, worked and walked here for the past 25 years. I attended a National Grid information event in Whittington regarding the plans and left thinking, what a waste of money! We don't even notice the pylons so won't feel any 'visual amenity benefits.' I'm sure there aren't any tourists waiting for a few thin structures to be removed from the landscape before they spend their money in the Cotswolds, and I doubt there are many locals who are so offended by the pylons that they support the increased cost of undergrounding, neither before nor since energy price rises.

I hope that lots of people will somehow be informed of this new consultation- I just happened to find out about it on the BBC News Gloucestershire webpage.

I agree with your decision to support Option 2- no undergrounding of cables.

Mrs Warren

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Daniel Jones

Hello,

I am emailing in response to the request for viewpoints on the NGET's Cotswolds VIP project. As some context I am an electrical engineering student at Southampton university and live in the Evesham area (not far from Cleeve hill), and am particularly familiar with the view of the ZF route.

I have walked the local area on a multitude of occasions; all along the regions that the ZF route covers and I have to admit the ZF.2B section is particularly imposing at a number of viewpoints. Whilst I understand financial cost of cabling and why it is not feasible in all case, it makes sense to utilise the prior decision to cable this section as NGET previously concluded. Additionally in my opinion, the year advancement in project schedule (which realistically won't occur) is not worth the loss of the "visual improvement mitigation benefits" and I believe NGET's assessment was correct. As for the cost difference of the project, the funding should be accepted as it was originally intended.

After asking my parents on their viewpoints of this, they stated: as the Cotswolds are such an area of outstanding natural beauty and attract such a vast amount of tourists from not only Britain, but abroad too, it would detract from future investment in the area and the VIP would aid the beauty of the area and is justifiable for the cost, especially as it was previously decided this was the preferred option.

I hope this project goes ahead as a VIP project.

Conflict of interests disclaimer:

I conducted a summer internship with NGET in the summer of 2025, within a team of SI.

All views are my own or my parents.

Kind regards,

Daniel Jones

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Adam Wilkie

As a resident of Gloucestershire I am deeply saddened that Ofgem would consider not pressing forward with this hard fought for project. I do not believe for one minute that not progressing this initiative will result in any reduction in consumer electricity prices given this government's crazy drive to "net zero"; The VIP project was one of the few positive things happening for the environment and national landscape.

I would urge you to reconsider this position.

Best wishes

Adam Wilkie