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Robert Hull  
Director, Transmission  
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9 Millbank  
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*By email*

Dear Mr Hull

Transmission Price Control Review (TPCR) – initial consultation

The Council for National Parks (CNP) welcomes the opportunity to respond to the above consultation. CNP is the national charity which works to protect and enhance the National Parks of England and Wales and areas that merit National Park status and promote understanding and quiet enjoyment of them for the benefit of all.

CNP welcomes the recognition of Ofgem's responsibility under the Environment Act 1995 to have regard to National Park purposes (para 3.43). We would be grateful if you could take the following points into account when reviewing and publishing proposals for the next stage of the TPCR:

1. CNP is pleased to note that one of the prime objectives for the review is to promote social and environmental objectives in recognition of the direct impacts that the transmission systems have on the environment, as well as the role that transmission systems play in facilitating broader social and environmental objectives
2. The Schedule 9 Statements which the transmission companies produce offer an opportunity to ensure a consistent approach to landscape and visual amenity issues. The National Grid Company's greater experience in this field should be shared with the other transmission companies to enable them all to operate on a level playing field
3. Transmission companies' investment plans should be publicly available in order to help the public understand and measure how these plans will assist in meeting their environmental duties. One way of doing this would be the inclusion of the plans in the companies' annual reports
4. Incentives for performance should include environmental quality
5. The TPCR should build on the lessons learned through the Distribution Price Control Review (DPCR) and allow companies additional expenditure for undergrounding overhead cables for visual amenity reasons. This would be consistent with the findings of the consumer research that was commissioned as part of the DPCR which demonstrated people's willingness to pay for environmental improvements in environmentally sensitive areas such as National Parks.

It would also help the companies and Ofgem fulfil their responsibilities under the Environment Act 1995<sup>1</sup> to have regard to National Park purposes. This is particularly important given the length of high voltage electricity lines in National Parks (5km) and the possibility of a major extension of the gas transmission network into the Brecon Beacons National Park

6. The infrastructure requirements of major renewable energy projects must be factored into the decision making process at an early stage and include opportunities for undergrounding where this would be environmentally desirable

Please do not hesitate to contact me should you require clarification of any of the above or any further information.

Yours sincerely

*Ruth Chambers*

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<sup>1</sup> Section 11A of the 1949 National Parks and Access to the Countryside Act as amended by Section 62 of the 1995 Environment Act.