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By email to [TPCR.responses@ofgem.gov.uk](mailto:TPCR.responses@ofgem.gov.uk)

Dear Mr Hull

### **Transmission Price Control Review: Second 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.

### **Environmental Considerations – Section 4.35 and Appendix 6**

CNP notes section 4.35 on environmental considerations which refer to Ofgem's various duties in respect of the environment. This section, although welcome, omits reference to the duty<sup>1</sup> placed on Ofgem to have regard to National Park purposes when coming to decisions or carrying out its activities relating to or affecting land within the National Parks. The government has recently clarified<sup>2</sup> that the duty is intended to ensure that the purposes for which National Parks have been designated are recognised as an essential consideration in reaching decisions or undertaking activities that would have an impact on the National Parks (Ofgem is listed on page 9 of this guidance note as a body to which the duty applies). CNP therefore suggests that explicit reference to this duty should be made when Ofgem lists its various environmental duties.

CNP welcomes the statement in para 4.36 that Ofgem will take account of its environmental duties in developing its proposals under the TPCR, which will therefore include taking account of National Park purposes.

Para 4.36 also states that Ofgem will seek to identify certain areas where assessment of environmental costs and benefits might be particularly relevant to decisions under the TPCR.

<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.

<sup>2</sup> Duties on relevant authorities to have regard to the purposes of National Parks, AONBs and the Norfolk and Suffolk Broads, Defra, 2005.

Given the duty to have regard to National Park purposes, the location of several high voltage electricity lines in the Parks (5km length) and the possibility of a major extension of the gas transmission network into the Brecon Beacons National Park, CNP suggests that National Parks are an area where special initiatives should be investigated.

In areas such as National Parks, which are statutorily designated for the conservation and enhancement of natural beauty, transmission investment should focus on forms considered to have a lower visual impact on the landscape (such as those listed in appendix 6: underground cables, low visual impact substation designs and noise reduction measures). This may be achieved by allowing transmission companies additional expenditure for such schemes in sensitive areas such as National Parks because of the benefits to visual amenity.

Consumers' willingness to pay can only be tested through evidence gathering but in the absence of such an exercise for the transmission system we suggest that the survey undertaken during the Distribution Price Control Review (DPCR) is of some relevance. This tested consumers' reactions to overhead wires in the landscape and their willingness to pay to remove or reduce any perceived impact on visual amenity. In our experience consumers' perception of impacts on visual amenity is greater for the transmission than for the distribution system, principally because of the greater size of structures involved, so the DPCR willingness to pay information should have some read across for transmission structures.

CNP agrees that transmission reinforcement stemming from changes in locational patterns of generation may have an adverse impact on visual amenity. This is hard to assess in the absence of information on the location and extent of any reinforcement. Such proposals should be considered transparently and, where there would be significant effects on visual amenity, a funding mechanism should be developed that would enable alternative routing or transmission options to be put forward.

CNP hopes that the above response is helpful. Please do not hesitate to contact me should you require clarification of any of the above or any further information.

Yours sincerely

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