

24 April 2006

Robert Hull  
Director – Transmission  
Ofgem  
9 Millbank  
London  
SW1P 3GE

Llywydd/President: Brian Blessed  
Prif Weithredwr/Chief Executive: Kathy Moore

6/7 Barnard Mews, London SW11 1QU  
Ffôn/Telephone 020 7924 4077  
Ffacs/Fax 020 7924 5761  
E-bost/Email <info@cnp.org.uk>  
Safwe/Web <http://www.cnp.org.uk/>

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

Dear Mr Hull

### **Transmission Price Control Review (TPCR): Third 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.

Page 14 of the supplementary appendices responds to the various points which we made in our submission to the Second Consultation. This contains the welcome recognition that environmental legislation will have an effect on transmission licensees' investment plans. We note that Ofgem, as part of its cost assessment exercise, will consider the appropriateness of any allowances for specific environmental investment.

We also welcome the recognition that one of Ofgem's objectives for the TPCR is to promote social and environmental objectives and that this will involve developing a set of proposals which reflects the direct impacts that the transmission systems have on the environment.

We note that in considering the proposals for the TPCR that Ofgem will seek to identify certain areas where assessment of environmental costs and benefits might be particularly beneficial. Given the evidence that suggests that consumers would be willing to support increases in their bills to conserve and enhance the landscape, and the commitment to explore alternative routes to traditional overhead wiring, CNP hopes that this will include a thorough assessment of opportunities for environmental enhancement in National Parks.

This would be consistent with 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.

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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.

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).

Given this duty, 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 considers that National Parks are an area where special initiatives should be closely investigated and we would hope that Ofgem's work programme will reflect this.

We hope that the final TPCR will allow transmission companies additional expenditure for schemes in sensitive areas such as National Parks where there would be benefits to landscape and visual amenity. This would enable transmission investment to focus on forms considered to have a lower visual impact on the landscape (e.g. underground cables, low visual impact substation designs and noise reduction measures).

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

*Ruth Chambers*

Ruth Chambers  
Deputy Chief Executive  
Tel 020 7924 4077 ext. 222  
Email [ruth@cnp.org.uk](mailto:ruth@cnp.org.uk)

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<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.