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President Brian Blessed    Chief Executive Kathy Moore

6/7 Barnard Mews London SW11 1QU

Telephone 020 7924 4077

Fax 020 7924 5761

Email [info@cnp.org.uk](mailto:info@cnp.org.uk)

Web <http://www.cnp.org.uk>

Robert Hull  
Director – Transmission  
Office of Gas & Electricity Markets  
9 Millbank  
London  
SW1P 3GE

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

Dear Mr Hull

### **Transmission Price Control Review (TPCR): Initial Proposals**

The Council for National Parks (CNP) welcomes the opportunity to respond to the Initial Proposals. 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.

#### **General comments**

##### **Para 12.11**

CNP welcomes the recognition that transmission assets reduce visual amenity and that visual amenity has a value to customers. However, we are not sure what is meant by the reference to different classes of customer and suggest that this is either deleted or clarified.

##### **Para 12.25**

CNP welcomes the cross reference to the DPCR and the allocation of additional funds for the DNOs to underground a proportion of their network in environmentally sensitive areas such as National Parks.

##### **Para 12.27**

Para 12.27 states that transmission towers are generally installed in more remote locations where fewer people live in proximity to them. The consultation document therefore appears to be hinting that there is less public interest in addressing visual amenity issues of the transmission system in remote rural areas such as National Parks. We would not agree with this view as millions of people visit remote areas such as National Parks every year to seek tranquillity and to experience wild, unspoilt and peaceful countryside. Clearly the existence of transmission towers in such remote locations can have a significant impact on public amenity even if the resident population is not large. This is significant because in National Parks the second statutory purpose is to promote opportunities for the public understanding and enjoyment of the Parks' special qualities.

We note that 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 includes the need to have regard to the promotion of opportunities for public enjoyment.

The government has 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).

#### **Para 12.29**

We welcome the commitment to continue work to explore the costs and benefits of undergrounding transmission lines and would urge that no final decision is taken until this work has concluded.

#### **Conclusion**

Given the duty on Ofgem with respect to National Park purposes, the location of several high voltage electricity lines in the Parks (5km length) and the proposed 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 transmission 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 clearly identified benefits to landscape and visual amenity, for example on refurbishment schemes. 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).

We would like to request a meeting to discuss our views on the TPCR and would hope that a similar roundtable meeting to the one that took place during the DPCR could be organised with CNP and partner organisations such as the Friends of the Lake District.

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.

I would be grateful if you could ensure that CNP receives future consultations on the TPCR as we only found out about this consultation from another organisation.

Yours sincerely

*Ruth Chambers*

Ruth Chambers  
Acting Chief Executive

Tel 020 7924 4077 ext. 222  
Email [ruth@cnp.org.uk](mailto:ruth@cnp.org.uk)

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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.

<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.