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Dear Mr Hull

#### **TPCR4 – Initial Proposals**

The Friends of the Peak District welcomes this opportunity to respond to this further stage of the TCPR. Friends of the Peak District (FPD) is an independent charity working to safeguard the unique landscapes of the Peak District for future generations. Managed by the Peak District and South Yorkshire branch of the Campaign to Protect Rural England, FPD is part of the national CPRE network and the Council for National Parks. Please note that the comments below relate only to the electricity transmission network proposals.

#### **General comments:**

para. 12.11: you note, as your 'starting point' for environmental considerations, your statutory duties but do not mention here (or, more significantly, in Appendix 2) your section 62 duties (as a 'statutory undertaker') in relation to National Parks under the Environment Act 1995. This should be remedied in principle and further action taken (see below) in relation to OFGEM's contribution to the purposes of National Parks;

para. 12.11: we are confused by the statement regarding the differing valuation of amenity enhancements between customer classes – this needs to be made clearer and substantiated in terms of the source research which establishes this view. The Peak District National Park receives in excess of 25 million day visits per annum, most of whom come to the Park to enjoy wild, unspoilt scenery, free from visual disamenity. This 'class of customer' would certainly deprecate landscape intrusion caused by the transmission network and greatly value its diminution;

para. 12.16: we note that the replacement capex allowance 'embody a significant amount of environmental betterment' but this statement is not 'unpacked' in any meaningful way. If assets are to be replaced (in the electricity transmission network), e.g. renewal of wires and towers, we do not understand what significant betterment has been achieved. In our view, betterment is best achieved by initiating a meaningful under-grounding allowance.

Para.12.17: reference is made here to the usual practice of dialogue between companies and the relevant environmental authorities. Best practice would also include dialogue with third party environmental and/or amenity interest groups. For example, this is already the case in relation to how NGET consult in relation to their s.9 (Electricity Act) duties but it is important for third party dialogue to be encouraged more widely.

President: Lord Hattersley

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