

27 March 2009

President Ben Fogle

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David Hunt Ofgem 9 Millbank London SW1P 3GE

By email to <u>transmissionaccessreview@ofgem.gov.uk</u>

Dear David

Transmission Access Review – Enhanced Transmission Investment Incentives Open Letter: Consultation on Short Term Measures

The Campaign for National Parks (CNP, formerly Council for National Parks) welcomes the opportunity to respond to the latest consultation on the Transmission Access Review. CNP is the national charity which campaigns to protect and promote National Parks for the benefit and guiet enjoyment of all.

We have no objection in principle to the commitment to develop new financial incentives for the transmission companies (TOs) to help to deliver investment in transmission in a timely manner. We have no views on the detail of the proposed short term measures. However, we would like to make two general points in response to this consultation:

- How will the potential environmental impacts of the proposed anticipatory investment be assessed? We suggest that this should be done in advance of the investment being agreed, as otherwise there is a risk that environmental impacts may not be considered until too late in the planning process
- Investment should allow for alternatives to new overhead lines or major refurbishments to be taken forward, especially where these would be in or near to nationally designated landscapes such as National Parks

We note that the open letter states that NGET has identified a range of projects which it considers to be on the critical path for 2020, for example projects in North and Mid Wales, which we understand may have implications for National Parks. It is important that these projects' environmental impacts are known and assessed before anticipatory investment is agreed and that the most environmentally acceptable options are factored into this investment so that they might be taken forward by TOs. We consider that both points must be addressed if Ofgem is to be able to demonstrate that it has complied with its statutory duty<sup>1</sup> to have regard to National Park purposes, which include the conservation and enhancement of natural beauty.

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

Yours sincerely

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Ruth Chambers
Acting Chief Executive

Chambers

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<sup>&</sup>lt;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