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President Ben Fogle Chief Executive Kathy Moore

Offshore Transmission Final Consultation
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Dear consultation team

Offshore Electricity Transmission – A further Joint Ofgem/DECC Regulatory Policy Update: Final Consultation Document

The Campaign for National Parks (CNP) welcomes the opportunity to respond to the above consultation. CNP is the national charity which campaigns to protect and promote National Parks for the benefit and quiet enjoyment of all. CNP would like to focus its comments on strategic investment (paragraphs 4.61-4.63).

Avoiding the construction of unnecessary infrastructure

CNP agrees with Ofgem's proposed scheme to guarantee the timely delivery of the required infrastructure to support offshore energy developments. However, this must not lead to irreversible decisions where infrastructure is built to connect offshore developments which are not then completed. This could have serious landscape and coastal implications and would result in the construction of unnecessary infrastructure.

Environmental impact of onshore transmission infrastructure

The environmental impact of the onshore infrastructure associated with offshore energy developments is an essential consideration for transmission operators and should be part of the incentive scheme. Transmission infrastructure in or near to National Parks with boundaries on or near to the coast could have a detrimental impact on their landscape and public enjoyment of it. National Grid is consulting on its draft commitments when undertaking work in the UK – these include a commitment to seek to avoid nationally designated areas such as National Parks if new infrastructure is required. CNP suggests that this welcome commitment is referred to in the final document.

Price control arrangements

CNP considers that Ofgem should investigate the scope to include an allowance for network undergrounding in National Parks in any price control arrangements, as per the current Distribution Price Control for 2005-2010. A number of potential offshore energy developments are located near to National Parks. Government policy is that major development proposals such as new transmission infrastructure should only take place in National Parks in exceptional circumstances. Financial support for undergrounding transmission lines could help to enable such developments to proceed and ensure that their adverse impacts are mitigated.

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

Yours sincerely



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