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By email to hannah.nixon@ofgem.gov.uk

Dear Hannah

Open letter consultation on Transmission Price Control Review 5 (TPCR5)

The Campaign for National Parks (CNP) welcomes the opportunity to respond to the open letter consultation. CNP is the national charity that campaigns to protect and promote National Parks for the benefit and quiet enjoyment of all. CNP has a long standing interest in all aspects of the electricity industry, particularly where generation, transmission and distribution of electricity have potential impacts for National Parks.

CNP believes that TPCR5 offers an important opportunity to reduce the impacts of the electricity transmission system (both existing and proposed) on visual amenity, particularly in or near to nationally designated landscapes such as National Parks.

We welcome Ofgem's continuing commitment to reducing the impact of the electricity distribution system on nationally designated landscapes and believe that this reflects the importance that Ofgem attaches to its statutory duty to have regard to the statutory purposes of designation of those areas. We hope that TPCR5 will enable Ofgem to pinpoint ways in which it might be able to implement its statutory duty more fully in relation to reducing the impact of the transmission system on nationally designated landscapes.

Environmental issues and primary outputs

CNP strongly supports the inclusion of 'taking into consideration and where appropriate seeking to minimise the visual impacts of infrastructure' as one of the primary outputs on environmental impact. That would be wholly consistent with Ofgem's duty to have regard to National Park purposes, since the purposes include the conservation and enhancement of natural beauty.

CNP suggests that examination of the undergrounding allowance within DPCR5 might offer assistance when considering how to measure the proposed primary output for the TPCR5, and that a simple measurable primary output would be the proportion of electricity transmission infrastructure placed underground during the TPCR period.

We welcome the proposal that research will be undertaken to support the review, including through surveys of customers' willingness to pay on a variety of issues. We consider that further research of customers' willingness to pay for the undergrounding of electricity transmission lines in or near to nationally designated landscapes would assist Ofgem in taking forward proposals for the TPCR5, especially as an analysis by Eftec in June 2006 found that there was a lack of suitable data in this area.

Furthermore, we believe that the critique provided by Dr Richard Cowell in October 2006 (appended to comments by the Friends of the Lake District on the update proposals for TPCR4) is highly pertinent to considering how to take this further research forward. In particular, we suggest that Ofgem should heed the advice that the willingness to pay approach should be broadened away from its current simplistic nature to one that studies nationally designated landscapes where visitor and resident experiences are affected by transmission infrastructure.

Enhanced engagement

We welcome the commitment to enhanced engagement and consider that the Price Control Review Forum should contain adequate representation from groups concerned with landscape and visual amenity issues. We would be happy to sit on the forum or to share a rotating seat with the other national bodies that represent the issues (CPRE, CPRW, and NAAONB). Two of the National Park Societies have been particularly involved in the issues (Friends of the Lake District and Friends of the Peak District) and we suggest that there would be significant merit in Ofgem considering how those bodies might contribute their expertise and be involved in the Forum.

CNP supports the Forum's draft terms of reference as set out in annex B. However, we suggest that the third bullet point is unnecessarily pessimistic. Assuming that trade-offs will need to be made could suggest that some options have already been rejected. Government policy on sustainable development is that its aims should be pursued in an integrated manner and not traded off against each other.

The UK Government Sustainable Development Strategy states the following 'purpose', as the framework goal for sustainable development:

For the UK Government and the Devolved Administrations, that goal will be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment; and a just society that promotes social inclusion, sustainable communities and personal wellbeing. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible.

We suggest that the reference to trade-offs is removed from the draft terms of reference.

Please do not hesitate to contact me if you would like clarification of any of the above or any further information.

Yours sincerely

Ruth Chambers

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