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Consultation on the RIIO-2 framework consultation Response by National Parks England

National Parks England (NPE) exists to provide a collective voice for the nine English National Park Authorities and the Broads Authority. NPE is governed by the Chairs of the ten Authorities. National Park Authorities may submit individual responses to the consultation which draw on issues specific to their areas.

We welcome the opportunity to comment on the RIIO-2 framework and are happy to discuss any of the issues raised in this letter with you in further detail. Our response address only two key issues:

- The need to retain environmental outputs in the framework. Especially those relating to visual amenity which have had significant positive impacts in National Parks.
- The need for continued engagement with National Park Authorities and other stakeholders on delivery of the outputs.

Framework Outputs (Question 19)

The RIIO-2 Framework should allow for visual amenity allowances to be included in the next set of price controls. Consumers' willingness to pay for the undergrounding of overhead lines in designated landscapes has been demonstrated through previous research and consultations and through the positive reaction to undergrounding projects that have been delivered to date. However, there are many more areas of our National Parks which would benefit from the removal of overhead lines. We are concerned that the consultation does not reflect on the positive work already done to reduce the visual impact of electricity infrastructure in protected landscapes or state clearly the importance of continuing this work. Much remains to be done to deliver the environmental outputs set out in the previous review and there is strong support for undergrounding of electricity infrastructure in protected landscapes.

The visual amenity allowance for distribution lines was first introduced in the 2005-2010 price control period and has had a positive impact in many parts of our National Parks. The equivalent scheme for transmission lines was only introduced in the current price control period and the scale of work required to plan and implement the removal of transmission lines is significantly greater so this allowance does not, at this moment in time, have as much impact. This is long term work that has only just begun to deliver and there is huge potential to build on the work that has been undertaken to date during future price control periods.

Ensuring the allowance is available in the next price control period will maximize the benefits from the preparatory work that has already been undertaken, such as the research National Grid commissioned to assess the landscape and visual impacts of all the overhead transmission lines in designated landscapes in England and Wales.

No changes are needed to the existing outputs and we would like the existing environmental outputs, including the one relating to visual amenity, to remain as they are shown in Figure 1 of the consultation document. The long-term goal for visual amenity should be that, where practically feasible and without harm to other environmental heritage (such as historic sites), that all new and existing distribution and transmission lines run underground through designated landscapes or avoid these areas altogether. As well as the continuation of undergrounding, we would like to see the continuation of the Landscape Enhancement Initiative (LEI) which delivers benefits on a smaller scale or where undergrounding is not feasible. Delivery of such programmes requires long term planning, engagement and delivery. Continuation of the undergrounding and LEI work through the next framework period enable delivery of existing and planned projects that are in the pipeline. It would also contribute to delivery of the aim of Government's 25 Year Environment Plan to 'safeguard and enhance the beauty of our natural scenery'

Stakeholder engagement and statutory duty (Question 1)

Engagement in National Grid's Visual Impact Provision (VIP) programme has been an exemplar of constructive engagement with stakeholders in public, private and third sectors. It has greatly assisted delivery of outputs from the previous framework review and we hope that such engagement will be continued in delivery of the RIIO-2 framework.

All relevant authorities, including Ofgem, have a statutory duty to have regard to the purposes of conserving and enhancing National Parks and AONBs when exercising or performing any functions affecting land within these areas. Development in the setting of designated landscapes can have a negative impact on their special qualities and it is important to remember that these duties also apply to activities undertaken outside the boundaries of designated landscapes which may affect land within them. In addition, section 3A(5) of the Electricity Act 1989 requires Ofgem to carry out its functions in a manner which is best calculated to contribute to the achievement of sustainable development and also have regard to the effect on the environment of activities connected with the generation, transmission, distribution or supply of electricity. Ofgem must ensure that it takes this requirement into account when considering its approach to environmental outputs.

We are happy for this letter to be made public as part of the consultation process. Please contact amanda.brace@nationalparksengland.org.uk if you would like further information about any of the issues raised.