

[Received by e-mail, dated 30 August 2018]

Dear Cissie,

Please find below the Ramblers' comments on Ofgem's "Consultation on our assessment of National Grid's proposal for reducing visual amenity impacts in the Dorset Area of Outstanding Natural Beauty".

The Ramblers helps everyone, everywhere, enjoy walking and protects the places we all love to walk. We are the charity dedicated to looking after paths and green spaces, leading walks, opening up new places to explore and encouraging everyone to get outside and discover how walking boosts your health and your happiness. Enabling people to walk in beautiful landscapes is at the heart of the Ramblers mission. We have a long history of collaborating with like-minded organisations to protect the unique sense of freedom that comes from being outdoors on foot and our participation in the Visual Impact Provision project stems from this ambition.

We have commented based on the questions provided in the consultation document:

Based on the information in this consultation, do you agree with our assessment of National Grid's approach in undertaking the Dorset AONB mitigation project?

In particular, we are looking for feedback regarding our approach on assessing the following elements:

- *implementation of the VIP policy*

As a member of the national Stakeholder Advisory Group, the Ramblers has helped to drive forward a scheme to improve the landscapes our members, and the general public, love. In part, this has meant shaping the four major projects being taken forward, including in the Dorset Area of Outstanding Natural Beauty (AONB). Ramblers' members and volunteers have shown a distinct interest in the initiative, demonstrating its value and the ability of its principles to capture the imagination of all who enjoy these nationally treasured landscapes. We will continue to encourage our members to participate through collaboration with their local AONB Partnerships and National Park Authorities.

- *project benefits*

We are fully confident that the Dorset project offers very real enhancement to the localities in which it sits and will greatly benefit the surrounding communities, as well as the many visitors who regularly seek out the landscapes it affects. Accordingly, we agree with Ofgem's assessment that this project has complied with the processes set out in the VIP policy and will deliver significant landscape benefits.

- *technical scope*

We do not consider that sufficient information has been provided in the consultation document for us to comment on this. Ofgem has stated that "it is our initial view that the requirement for the undergrounding of the eastern circuit of the two SSEN owned 33kV overhead lines has not been justified. There are several lower cost mitigation actions that should be considered to

manage these risks. National Grid hasn't yet justified why other low cost alternatives are not suitable". However, it has not outlined what the other alternatives could be.

- *procurement process and delivery strategy*

We agree that, based on the information provided, the procurement process has shown robustness and transparency.

- *risk management.*

As above, we are not able to comment on the proposal to reduce the risk mitigation costs for the SSEN 33kV eastern circuit diversion as the alternative measures have not been outlined. Under Project management and duplicated costs, Ofgem states that "National Grid included allowances for two of the same risk activities. It is our view that these have been double counted and we are proposing to remove duplicated allowance for this risk.". The consultation document does not give details of the possibly double counted risk activities, so it is not possible to comment on this.

- *Based on the information in this consultation do you agree with our assessment of proposed efficient costs for the Dorset AONB mitigation project?*

With the exceptions noted above, we agree with Ofgem's assessment that the Dorset project has complied with the processes set out in the VIP policy and will deliver significant landscape benefits.

- *Do you have any other comments or information relevant to our assessment?*

We have no further comments but wish to restate our continued commitment to the VIP project.

Should you have any queries on the above, please do not hesitate to contact me.

Best regards,

Alison

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The Ramblers