

I am writing on behalf of the Dartmoor Preservation Association, the amenity body which has campaigned for the protection of Dartmoor for over 130 years. We are also a member of the Campaign for National Parks, which has provided a comprehensive to your consultation, that we wholeheartedly endorse. In particular, we would like to echo the CNP's comments on the question ETQ46, set out below:

ETQ46. Do you have views on retaining the existing scheme to mitigate the visual impact of pre-existing transmission infrastructure in designated areas?

"We feel very strongly that the existing scheme to mitigate the visual impact of pre-existing transmission infrastructure in designated areas should be retained. There is a very strong case for this scheme and a high level of support for removing electricity infrastructure from designated landscapes as demonstrated by a number of different studies relating to both transmission and distribution operations. Most recently National Grid's 'acceptability' survey in 2018 identified that two-thirds of bill-payers find it acceptable for the cost of visual amenity projects to be passed on to consumers.

It is essential that the RIIO-2 Framework retains a provision for TOs to reduce the visual impacts of existing infrastructure. While much has already been done to reduce the visual impacts of electricity infrastructure, there are still many more parts of our National Parks which could benefit from the removal of overhead lines. The long-term goal for visual amenity should be that, where practically feasible, all new and existing distribution and transmission lines run underground through designated landscapes and their settings or avoid these areas altogether.

The visual amenity allowance for distribution lines which was first introduced in the 2005-2010 price control period, has already delivered many significant improvements. As the scheme for transmission lines was only introduced in the current price control period, it has not yet had as much impact, particularly as the scale of work required to plan and implement the removal of transmission lines is much greater. However, there is huge potential to build on the work that has been undertaken to date during future price control periods. Retaining the existing scheme will maximize the benefits from the preparatory work that has already been undertaken. For example, National Grid commissioned extensive research to assess the landscape and visual impacts of all the overhead transmission lines in designated landscapes in England and Wales. There is also strong support for this work as demonstrated by the commitment of the organisations, including Campaign for National Parks, represented on the Stakeholder Advisory Group for National Grid's Visual Impact Provision (VIP) project and the amount of time they are putting in to this work. It is essential that full value for money is achieved from all the resources that have already been put in to establishing the scheme.

Consideration should also be given to the growing body of evidence about the value of National Parks to the rural economy. For example, in England alone there are 94 million visitors to National Parks and surrounding areas each year, spending more than £5 billion between them and supporting over 75,000 full time equivalent jobs . Many of these visitors are specifically attracted to these areas by the natural beauty of the landscape. Measures to enhance the landscape and visual amenity of National Parks will help support aspirations in both England and Wales to increase the number of visitors to National Parks , including those from overseas whose views will not have been taken into account in the WTP research.

We believe that the public is entitled to expect that its top quality designated landscapes should be free of visual intrusion and, if they are marred by electricity transmission infrastructure then the value of that amenity loss is better captured in terms of WTA. That being the case, it would be of net benefit to society if the funding for the visual amenity scheme was equivalent to public willingness to accept compensation for the

persistent presence of visual intrusion. Ofgem took a very conservative approach to setting the visual allowance cap in RIIO-1 and we would not want to see that happen again this time."

Regards,

Philip Hutt
Chief Executive, Dartmoor Preservation Association