

My name is Rob Meetham and I am a Landscape Architect at the Peak District National Park Authority.

ETQ45. We welcome views on incentivising the TOs' engagement with stakeholders on the development of new transmission projects through our stakeholder engagement proposals, for example through the use of a survey.

This refers to new build infrastructure and it is agreed that a survey could be used to cover stakeholders' satisfaction with TO's on new project development and design covering engagement opportunities, quality of information about a project and transparency of TO decision-making (especially regarding stakeholder feedback and National Park purposes).

ETQ46. Do you have views on retaining the existing scheme to mitigate the visual impact of pre-existing transmission infrastructure in designated areas? Do you agree that any decision to implement new funding arrangements should be subject to updated analysis around willingness to pay?

The existing scheme should be retained (though there is scope for improving the process).

The existing Visual Impact Provision (VIP) project and in particular, the Landscape Enhancement Initiative (LEI), are making improvements to landscape character and natural beauty in National Parks and has the potential to make many more and on a greater scale.

The VIP (and especially the LEI) are a welcome initiative and represent substantial investment in the first purpose of all UK National Parks, that is to Conserve and enhance the natural beauty, wildlife and cultural heritage. To retain the existing scheme would build on the work already undertaken and lead to important mitigation of the visual impact of pre-existing transmission infrastructure over a wider range of projects in National Parks. National Park management plans place emphasis on reducing visual impact on and harm to natural beauty and this is supported by both individual National Park Planning Policies and by the Government's National Planning Policy Framework. The protection of National Parks' natural beauty is set at the highest bar and the opportunity that the VIP project gives for enhancing natural beauty by the removal and mitigation of the transmission infrastructure is of great importance.

To maintain the transparency which has led the current VIP project and LEI process it would seem sensible to update analysis around willingness to pay from consumers for the RIIO-ET2 period.

Given the assessment work undertaken as part of RIIO-ET1 it would be a great shame to not build on this and deliver a second phase of undergrounding (and LEI) in the next price control period. The assessment work and development which has been carried out in RIIO-ET1 would enable a 'running start' in RIIO-ET2 and therefore allow more time for potentially complex projects to be delivered over a longer time frame.

ETQ47. Do you agree with our proposals to modify the implementation process by which funding requests for mitigation projects are submitted and approved?

The proposed modification of the LEI application and approval process is generally supported. We (the PDNPA) have met with resourcing issues in the lengthy LEI funding process and challenges in sourcing 25% match funding. The length of time between

submission of full applications and the final award of the funding has also been problematic. I believe that these factors (plus the limit of £200,000 per project) has been a blockage to the wider uptake of the scheme across National Parks and AONBs.

If part of the application can be shortened this will benefit the planning of resources of both the National Park concerned and their partner organisation and/or landowners. The proposal that the TOs work with National Parks throughout the LEI application process with Ofgem only being involved at the very end of the process with the statutory licence advertising period (4 weeks), is welcomed as this will help speed the application process up and give more certainty as to when funding will be available.

However, the setting of an expenditure cap to 2.5% of the £500 million budget for the VIP project would lead to £12.5 million for the LEI fund in the second price control period. This is substantially less than the £24 million currently available. It is known that take up of the LEI fund so far has not been as high as was hoped for but if (a) the process is streamlined and (b) the match funding requirement could be reduced and the amount which is available is increased (say, to £300,00 per application?), then there is potential for significant increase in take up of the fund.

ETQ48. We welcome stakeholders' views on any other considerations they think are relevant to policy development for visual amenity issues in RIIO-ET2.

It could be very fruitful for the LEI to fund the preparation stage of the applications, as happens with other funding bodies such as the Heritage Lottery Fund. This would help the resourcing of officer time at the National Parks, who are the main contributors to the application process even when working with partner organisations. Considerable resources go into the production of an LEI application and at a time when National Park funding has been cut in the Government Comprehensive Spending Reviews, it would considerably help the National Parks resource the time spent on the applications.

It is felt that there is scope to widen the area that can be taken into consideration for the visual impact of pre-existing transmission infrastructure, outside the boundary of a National Park. This could apply to potential undergrounding and the LEI fund if the visual impact of the infrastructure outside the National Park boundary can be proved to have a sufficiently negative impact on the landscape character and natural beauty of the National Park. The assessment could take the form of a one off, site specific, Landscape Visual Impact Assessment carried out by an independent landscape consultant that would be examined by the VIP Stakeholder Advisory Group for its veracity and appropriateness.

Kind regards

Rob