

Introduction

Snowdonia was designated a national park in 1951 to safeguard its special qualities. These include spectacular scenery, and a wealth of cultural heritage and biodiversity. It is home to over 25,000 people, many of whom work in the National Park where the Welsh language continues to be a living and vibrant language. Each year around 6 million people visit Snowdonia to enjoy these special qualities, and in doing so, contribute greatly to the local economy. Snowdonia National Park Authority (SNPA) was established in 1951, and has 2 statutory purposes, which are to:

1. Conserve and enhance the natural beauty, wildlife and cultural heritage
2. Promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public

Snowdonia is one of the potential beneficiaries of the project to mitigate the visual impact of pre-existing transmission infrastructure. The potential undergrounding of pylons in the Dwyrdd Estuary in Snowdonia is one of 4 projects included in the National Grid's Visual Impact Provision (VIP) project.

SNPA have also been beneficiaries of the landscape mitigation scheme – the National Grid's Landscape Enhancement Scheme (LEI), having secured 3 separate landscape mitigation projects to date with a combined value of £600,000 – with further expressions of interest submitted too.

ETQ46. Do you have views on the 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?

SNPA strongly supports the retention of the existing scheme. National Parks are afforded the highest status of protection in terms of landscape and scenic beauty. There are many pre-existing transmission lines that have highly adverse visual impacts in designated landscapes throughout the UK – many of these schemes would probably not receive planning permission today. This project can address such discrepancies for the public good.

The existing scheme to mitigate the visual impact of pre-existing transmission infrastructure has been a bold and ambitious project delivered at an ambitious scale, and is directly relevant to the first statutory purpose of National Parks – that of “conserving and enhancing natural beauty...”. The benefits of this type of enhancement at a ‘landscape scale’ provides benefits for the nation as a whole.

Removing the significant adverse landscape and visual effects in some of the UK's most iconic and loved landscapes will benefit everyone that visits them – locals and visitors. This not only leads to visual enhancement at a ‘landscape scale’, but also to increased appreciation of these special places, wellbeing benefits to people that visit them, increased visitor numbers along with knock on economic benefits through visitor spend. They may also even get people to think further about landscape issues – perhaps something that many

take for granted – and increase people’s appreciation of the significance of landscape beauty in its effect on people. These benefits are spread much wider than the immediate affected local communities – with National Parks truly being landscapes for the national as a whole, along with their associated benefits.

Therefore SNPA strongly support the retention of this scheme into RIIO 2.

Selecting further existing transmission lines for undergrounding should be led by an independent landscape assessment of all existing lines – and could build upon the data previously used for such assessments.

The use of some of this funding for landscape improvement schemes (through the National Grid’s Landscape Enhancement Initiative) is an important part of the scheme, and whilst it uses less than 5% of the overall £500M budget, it spreads the benefits of pylon mitigation to a broad geographic area – with potential schemes in any National Park or AONB affected by pylons. Such benefits will therefore benefit a large number of people. The £24M made available through this in the National Grid’s ‘Landscape Enhancement Initiative’ (LEI) goes much further too, with partner organisations providing match funding opportunities.

We also offer our support to the proposed administrative change included in the consultation in terms of approval of individual projects under the LEI. For the record we agree that administration of a pre-agreed fund by an independent panel would be appropriate, hence reducing the Regulatory burden on Ofgem.

It is absolutely critical that all of these projects have the support of customers – therefore it is important that there is an updated assessment of willingness to pay. Without positive support for the principle of this scheme from customers, progressing such schemes would be problematic.

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

I have no observations to make regarding modifications of the implementation process by which funding requests for the high cost mitigation projects.

For new mitigation projects involving low cost solutions eg screening, landscape enhancement, the setting of a project cap would appear reasonable – although it should be capped at a level that enables the best use of opportunities to mitigate transmission lines. For example the current allowance under this scheme has been slightly less than 5%, and SNPA quickly utilised their allowance under this scheme (although further windows will open to apply again in the future) – SNPA had significant capacity for further expenditure through this scheme. Potential projects have not progressed because the cap set out per individual Authority has been reached at this point in time. This may partly be due to the fact that SNPA is a large National Park with a relatively high amount of transmission lines. However, this issue should be considered when setting out the amount of the overall budget that will be allocated to this.

It could also be the case that the amount and quality of low cost mitigation projects could increase as more National Parks and AONBs understand the scope and potential of such projects as they learn from other areas who have been successful in securing such funding. The role and involvement of stakeholders e.g. National Trust, Community Councils, voluntary groups and charitable groups e.g. Ramblers, is important in these projects – both in terms of overall project support but also match funding opportunities is very important.

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

Given the large extent of transmissions lines with an unacceptable effect currently within designated landscapes we do not consider at this stage that there is a need to divert focus away from such landscapes towards World Heritage Sites or similar sites outside designated landscapes. However, WHSs within designated landscapes could be afforded a higher 'weighting' in the overall assessment of transmission lines.