

Thank you for the opportunity to comment on these consultation proposals.

As a National Park Authority we have a particular interest in the proposals regarding the visual amenity impacts of transmission infrastructure. **The Authority would very much welcome the retention of an allowance to fund visual amenity improvements as part of RIIO-ET2.**

The Authority has had little involvement in the RIIO-1 Visual Amenity Project (VIP) because, when the policies and proposals were being developed, the Yorkshire Dales National Park was largely unaffected by National Grid infrastructure. The Authority was consulted at the outset of the process, in view of the proposal that lines that were in reasonable proximity to National Parks/AONBs should be considered eligible under the VIP project. At that time the dual transmission line between Kendal (Middleshaw) and Penrith was 3 miles distant from the National Park's western boundary at its closest point and so, mindful that other AONBs and National Parks were far more directly impacted, the Authority withdrew from the process. As a result we cannot offer much comment on the process of stakeholder engagement that has taken place to date.

In August 2016 the Yorkshire Dales and Lake District National Parks were extended to take in additional areas of valued landscapes. This has acted to close the gap between the two National Parks, formerly 4.5 miles apart at their closest, but now almost contiguous with one another. It is within this closed gap that the majority of the Kendal-Penrith dual transmission line sits and the extensions to the respective National Parks have resulted in the line having a far greater impact on the designated areas than was previously the case.

Prior to 2016 the line entered the Lake District National Park for around 2.5 miles of its length at Borrowdale/Crookdale but sections north and south of this stretch remained in close proximity to its boundary. The assessment of visual impact (Land Use Consultants, 2014) carried out to inform the VIP project acknowledged the uncertainty created by the then proposed National Park boundary extension, but assessed the line's impact solely in terms of the stretch within the then Lake District National Park boundary.

Clearly there has been a material change in circumstance since this assessment was conducted, so there is a need to revisit the assessment of impact. The extensions to the National Parks have increased the length of line within the Lake District National Park to around 4 miles but has also acted to bring the western boundary of Yorkshire Dales within much closer proximity to the line (450m at its nearest). It now impacts strongly on the setting and views in/out of the extended Yorkshire Dales National Park, resulting in visual impacts, especially for visual receptors along the scenic routes such as the A6 and B6261.

With all this in mind, we would ask that **the proposals at 4.111 of the Electricity Transmission methodology proposals make it clear that the VIP under RIIO-ED2 will continue to consider lines outside of but in reasonable proximity to National Parks, and that assessments of impact are revised to take account of changes to National Park boundaries that have taken place more recently.** The Authority remains acutely aware that there will be a definite limit to the number of visual amenity projects that can be brought forward under RIIO-ET2 and that there may well higher priority cases for consideration, however we would just like to ensure that the transmission line adjacent to our western boundary is given full consideration as part of the process.

Yours sincerely



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