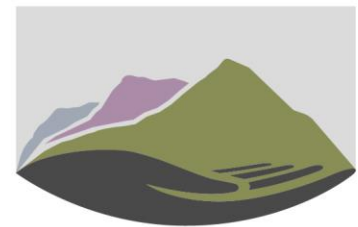


Julie Black
Programme Director
Network Price Controls
Ofgem



Cymdeithas Eryri
Snowdonia Society

Submitted via online proforma

<https://www.surveymonkey.co.uk/r/RIIO2cfe>

6th February 2020

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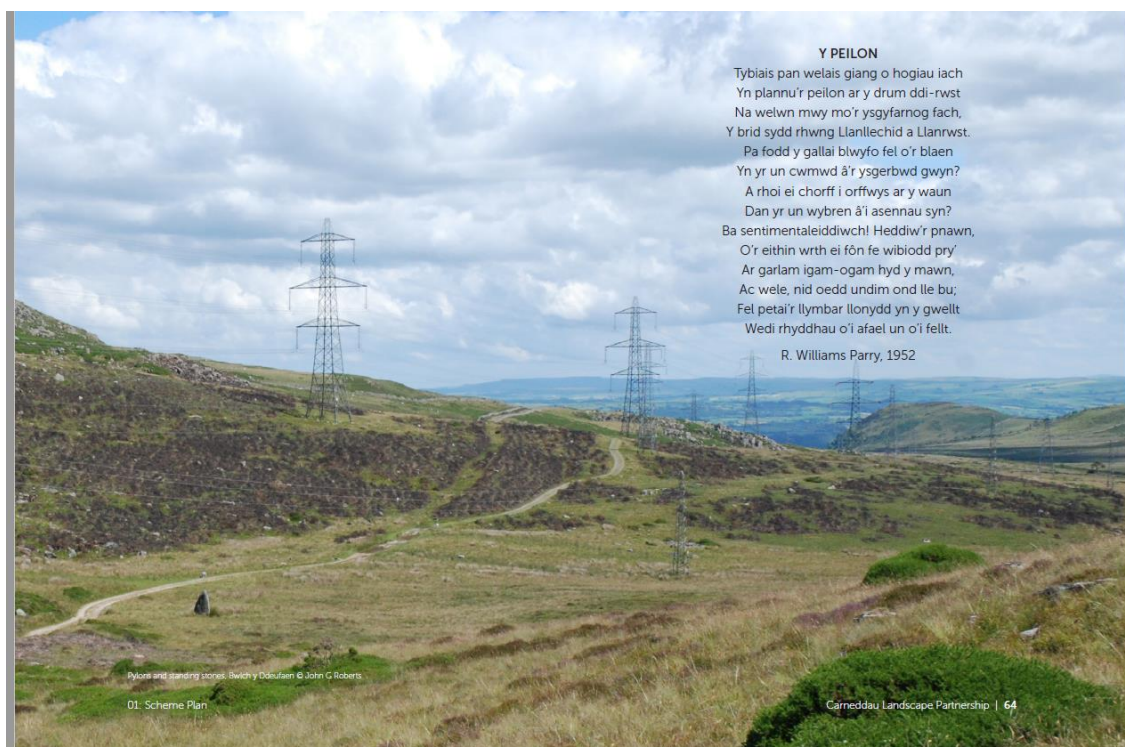
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Response from Cymdeithas Eryri Snowdonia Society to Ofgem Call for Evidence on National Grid's draft Business Plan for RIIO-2

The Snowdonia Society is a registered charity established in 1967, which for over 50 years has contributed to the work of caring for and protecting Snowdonia. The Society's purpose is to protect and enhance the beauty and special qualities of Snowdonia and to promote their enjoyment in the interests of all who live in, work in or visit the area both now and in the future. Thank you for the opportunity to provide input to this call for evidence. Our response focuses on National Grid's proposed approach to visual amenity which is set out in Chapter 11 (p.121-138) of the [National Grid RIIO2 Business Plan](#)



Above: Bwlch y Ddeufain neolithic standing stones in Snowdonia National Park, as featured on p.64 of the Landscape Conservation Action Plan for the Carneddau Landscape Partnership Project, a five-year £4m project funded by National Lottery Heritage Fund.

Cymdeithas Eryri the Snowdonia Society
1967 - 2017

Yn gwarchod, gwella a dathlu Eryri ers 50 mlynedd - Protecting, enhancing and celebrating Snowdonia for 50 years

Elusen gofrestredig rhif/Registered Charity no: 1155401



Above: the North Wales Coast path above Llanfairfechan in Snowdonia National Park.

Understanding the need for the visual amenity allowance

Relevant public bodies have a statutory duty under [Section 62 of the Environment Act 1995](#) to have regard to the purpose of conserving and enhancing designated landscapes when exercising or performing any functions affecting land within these areas.

In addition, there are requirements under section 3A(5) of the *Electricity Act 1989* to have regard to the effect on the environment of activities connected with the generation, transmission, distribution or supply of electricity. Reducing the visual impact of electricity infrastructure allows both National Grid and Ofgem to demonstrate that they are meeting these responsibilities.

Direct environmental improvements under the visual amenity allowance also contribute to delivery of:

- [Well-being of Future Generations Act \(Wales\) 2015](#),
- Sustainable Management of Natural Resources under the [Environment \(Wales\) Act 2016](#),
- Welsh Government objectives for designated landscapes in the Policy Statement '[Valued and Resilient](#)' 2018.

Building on the existing scheme will make best use of the preparatory work that has already been done and allow stakeholders to consolidate the benefits and lessons learned so far. 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. It is essential that full value for money is achieved from all the resources that have already been put in to establishing the scheme.

There is a growing body of evidence about the value of National Parks to the rural economy. For example, Snowdonia alone attracts over 4 million unique visitors per year. Most of these visitors are specifically attracted by the natural beauty of the landscape. Measures to enhance the landscape and visual amenity of National Parks will support delivery of the key rural economy benefits generated by designated landscapes in both England and Wales.



Above: crossing Nant Anafon and the Coedydd Aber Site of Special Scientific Interest above Abergwyngregyn in Snowdonia National Park, dominating the route for the vast numbers of people who visit Aber Falls each year.

Setting the size of the allowance

After several years of commitment and hard work the VIP programme is now well-established. Significant work is underway which will have transformative positive impacts on landscapes of national importance. Looking ahead, the VIP process has also identified an evidence-based shortlist of priority projects which can go forward. It is therefore essential that the size of allowance allocated for T2 is set at an appropriate scale to ensure this significant momentum can be maintained.

Given the scale of the impacts of high- and low- voltage transmission lines on our designated landscapes it is necessary to set high ambitions for the visual amenity programme. Clearly this means setting the size of the allowance at a substantial level for delivery. Given the heavy investment in research and evaluation in T1, it is obvious that T2 should be able to deliver both at scale and with a higher direct return on investment than T1.

The Challenge Group report published on 24th January 2020 includes the following statement: “We recognise that there is some evidence of stakeholder support for those programmes, but would urge Ofgem to take full account of the cumulative impact on bills and decarbonisation benefits when considering the programmes, both individually and in the round.”

In response **we urge Ofgem to recognise the evidence of stakeholder support for the visual amenity programmes – including the Willingness-to-Pay figures, and we further urge Ofgem to take full account of the cumulative benefits to the people, communities, local economies, environment and landscapes which are most impacted by transmission infrastructure.** Those cumulative benefits include enhanced well-being for vast numbers of people - visitors and residents alike - over multi-generational timescales.

Yours sincerely



John Harold

Director, Cymdeithas Eryri Snowdonia Society



Above: near Trawsfynydd, Snowdonia National Park.