

Liam Murdock

From: Hoda Gray <hoda.gray@nationalparksengland.org.uk>
Sent: 04 September 2020 11:11
To: RIIO2
Subject: Follow up response from National Parks England on OFGEM's consultation on RIIO2 Draft Determinations
Attachments: Cowell report on visual amenity allowance RIIO-2 DD Sept 2020 FINAL.pdf

Dear OFGEM,

Following up to the response of 19 August 2020, National Parks England would like to provide the following supplementary comments with regards to **question ETQ7**:

The long-term future of England's National Parks as the breathing spaces for the nation is certainly enhanced by investment of RIIO2 into the Visual Impact Provision project. With regards to the expenditure cap, we believe that it should be increased for the reasons set out in the 'Cowell Report' which we have commissioned jointly with other environmental NGOs. Please find this report attached.

While we fully endorse the investment in green infrastructure for natural areas, and in particular protected landscapes, we believe the minimum level of investment for setting the expenditure cap is insufficient. We support the main thrust of the Cowell Report, and in particular would advocate for that the cap be set at a higher level.

Best regards,

Hoda Gray

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National Parks

From: Sarah Kelly
Sent: 19 August 2020 11:14

To: RIIO2@ofgem.gov.uk <RIIO2@ofgem.gov.uk>

Subject: Response from National Parks England on OFGEM's consultation on RIIO2 Draft Determinations.

Dear OFGEM,

National Parks England (NPE) are the Association of the Authorities which look after the 10 National Parks in England, working to promote their needs.

As the chosen representative of NPE to respond to this consultation, being a landscape specialist working in one of England's National Parks and also a member of the Stakeholder Advisory Group formed to steer the work of National Grid's Visual Impact Provision, I have the following response to question **ETQ7: What are your views on our consultation position for setting the expenditure cap for visual amenity mitigation projects in RIIO-2?**

The innovative and robust approach of National Grid's Visual Impact Provision project has been impressive from the start with a clear set of objectives and a forensic approach to the analysis of the visual impact of existing transmission lines on the landscapes of the most precious and highly protected landscapes in England and Wales, our National Parks. The undergrounding of transmission lines and the amelioration of their impact on these landscapes is of the utmost importance to the natural beauty and cultural heritage of National Parks in England and is groundbreaking in its approach, being both brave and bold.

The UK Government's recent Glover Review, specifically looking at National Parks, how to protect them and their place in UK society, re- states the importance of conserving and enhancing these special places. The work of the Visual Impact Provision project unequivocally addresses these particular issues with the removal of overhead transmission lines and improvements to landscape infrastructure where such removal is not possible.

The long term future of England's National Parks as the breathing spaces for the nation is considerably enhanced by the substantial investment of RIIO2 into the Visual Impact Provision project. I fully endorse this investment in the green infrastructure of England and the natural beauty of our National Parks and support OFGEM's continued allocation of funds into RIIO2 to allow this work to continue.

Kind regards,

Sarah Kelly CMLI
Landscape Architect.



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