



The countryside charity
Peak District and
South Yorkshire

OfGEM
The Office of Gas and Electricity
Markets
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7 January 2021

Dear Mr Winch,

Response to consultation on Ofgem's assessment of NGET's proposal for reducing visual amenity impacts in the Peak District National Park

We strongly support NGET's proposed removal of a 2km section of 400kV overhead lines, to be replaced with an underground cable, in the Peak District National Park (Peak East).

CPRE Peak District and South Yorkshire has a long history of involvement in issues of powerlines (both transmission and distribution), visual amenity and landscape protection. In the 1960s our CPRE branch ensured that the 400Kv transmission line between Stalybridge and South Yorkshire was concealed for 3 miles in the Woodhead tunnels. More recently we campaigned for undergrounding of the line within Longdendale and have worked closely with Campaign for National Parks, national CPRE and others for undergrounding of distribution and transmission lines in all nationally designated landscapes. This resulted in development of the Visual Impact Provision or VIP project, and proposals for Dunford. Peak East is therefore for us the fruition of a long campaign to underground intrusive wires and pylons. It is also a major opportunity to enhance the Peak District National Park and its setting, and the openness of the Green Belt.

We believe that the VIP policy has been followed to the letter and the project benefits will be substantial. Undergrounding this section of the line would result in great landscape enhancement benefits as it would remove the most intrusive sealing end compound at Dunford Bridge and other pylons situated in elevated locations

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around the Trans Pennine Trail car park. It would therefore conserve and enhance the natural beauty, wildlife and cultural heritage of the area. Environmental impacts have been addressed on site where possible but biodiversity net gain of more than 10% in the surrounding area brings a positive outcome for nature. The project will result in excellent opportunities to encourage public understanding and enjoyment of the protected landscapes, as the location represents an important and overlooked gateway to the Peak District National Park. To that end NGET made substantial efforts to engage with the public and stakeholders over several years. Delivering the project would allow NGET to fulfil its statutory section 62 duty to have regard to the purpose of conserving and enhancing the National Park when exercising or performing any functions affecting land within it¹.

We therefore agree with OfGEM's assessment of the project in Table 1 of the consultation letter. To the finding of 'Good documentary evidence of steps NGET has taken to implement commitments in its VIP policy' we would add that, having been engaged as stakeholders by NGET from the beginning of the project, the VIP policy has been applied fully in practice in both a meaningful and positive way. Challenges, from managing traffic impacts to designing a temporary replacement trans-Pennine Trail, have been addressed constructively and transparently.

We understand from NGET that the reduction in funding is acceptable, although we welcome OfGEM's commitment to further review and update the costs and impacts of changes, particularly in the context of Brexit, before it makes the final decision on funding.

We therefore urge OfGEM to approve the funding for the project, so that both NGET and OfGEM can fulfil the section 62 duty to National Parks to which they are both subject.

Yours sincerely

Anne Robinson, Campaigner

¹ Section 11A(2) National Parks and Access to the Countryside Act 1949 (National Parks) as amended by Section 62 Environment Act 1995
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