

Response from the Campaign for National Parks to National Grid's Visual Impact Provision

Q1. Do you have any overall comments on the draft policy?

In general, there is much that we welcome in this draft policy, particularly the collaborative approach to stakeholder engagement and the development of a clear set of guiding principles at an early stage. We are pleased that National Grid appears to have taken on board many of the suggestions that we raised previously and we welcome the opportunity to be part of the Stakeholder Advisory Group. We also welcome National Grid's commitment to working collaboratively with the Distribution Network Operators as this will maximise the impact that can be delivered from both allowances.

Q2. Do you support the broad approach to using the Visual Impact Provision?

Yes.

Q3. Why do you support/not support the broad approach to using the Visual Impact Provision?

We support the broad approach to using the Visual Impact Provision as we believe that working with the range of stakeholders proposed and using a set of guiding principles which have been agreed on following consultation is the fairest way of prioritising the schemes to benefit from this allowance. We are broadly supportive of the guiding principles as proposed but have a suggestion for improving these slightly (see our response to Q5). We also particularly welcome the proposal to appoint a qualified landscape architect to compare and evaluate the relative impacts of different lines with regard to landscape character and visual amenity as this will provide an objective assessment of the landscape enhancement benefits to be gained from different schemes.

Q4. What concerns, if any, do you have about the draft policy?

We have a couple of concerns about aspects of the draft policy which we believe need to be clarified. These are covered in response to Q6 below.

Q5. Are there any modifications to the draft policy and the associated processes that you would like us to make?

Yes, we would like you to add 'which cannot be mitigated' at the end of the second guiding principle. This will ensure that schemes are not rejected as a result of impacts, for example on geology or soils, which could be mitigated.

We would also like to see the inclusion of something similar to the 10% allowance that is included in the visual amenity allowance for Distribution Network Operators (DNOs). Currently each DNO has the flexibility to spend up to 10% of their allowance on undergrounding overhead lines located outside National Parks and AONBs e.g. where an overhead line crosses an National Park boundary. The feedback we have had suggests this works well.

A similar form of flexibility for this provision would ensure that lines (or parts of lines) which have a significant impact on National Parks but which are located outside their boundaries could be considered for inclusion.

Q6. What questions, if any, do you have about the draft policy and the broader initiative? Is anything unclear?

It is unclear whether the new provision is intended to be spent only on the additional costs resulting from visual amenity improvements or whether it would be used to cover the costs of an entire scheme, for example, where the improvements are being introduced in conjunction with the replacement of existing lines which would have taken place anyway. Our view is that it should only be used on the additional costs relating to any visual amenity improvements which are over and above the cost of like-for-like replacement. This would be consistent with the stated purpose of the provision, as set out in the introduction to the draft policy, namely 'to mitigate the visual impact of existing electricity infrastructure in nationally protected landscapes in Great Britain'.

We welcome the intention to review the policy document halfway through the price control period. However, we are concerned that there is no mention of the fact that the £500 million is an initial expenditure cap. Our understanding is that Ofgem is willing to review this cap if Transmission Operators (TOs) request it and we would like to see this happen.

Q7. Is there any information you think we ought to publish alongside the final policy that would assist with the use of the Visual Impact Provision?

Q8. Are there particular ways you would like us to engage with you?

We are happy with the existing engagement we have with National Grid. However, we are keen to ensure that you are also engaging directly by email with the National Park Societies (NPS), which represent the voluntary sector interest in each of the National Parks. We can provide contact details for these if needed. In addition, it may be helpful for you to provide a presentation to one of the meetings we hold for NPSs. This would ensure that all of the NPSs have a good understanding of the process and would assist us in best representing their interests.

For further information about anything in this response, please contact:

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