To:

National Grid Plc

1-3 The Strand

London

WC2N 5EH

Dear Sir

**Reference: The Great Grid Upgrade, Grimsby to Walpole**

I am writing to strongly oppose National Grid’s (NG) installation of overhead pylons and sub-stations[[1]](#footnote-1) across Lincolnshire.

I have read NG’s Corridor Preliminary Routing and Siting Study (CPRSS) that acknowledges there are clear impacts on the landscape, the environment, health, safety and local communities for each of the options and have tried to understand why NG concluded that pylons were the preferred option. Ultimately, this seems to boil down to cost as, for every option outlined, all of the other key considerations seem to have been brushed aside. This has also been confirmed by NG itself on national news. It suggests that any disruption or destruction caused can be mitigated by “careful routing”. This is totally preposterous. The pylons are 50m high, not much shorter than Boston Stump, which can be seen for miles around. So, irrespective of where the pylons are sited, no amount of ‘careful routing’ will mitigate the visual impact of these monstrosities**. Please explain** what NG means by ‘careful routing’ and how it will be able to effectively ‘hide’ 420 x 50m high pylons, particularly as the areas where the pylons are proposed are flat with no ‘hiding places’.

Furthermore, I don’t believe NG has really considered the impact to the Lincolnshire coast. There are a number of reasons why this proposal is ill conceived, totally inappropriate and environmentally explosive, as follows:

1. **Local communities**
   1. Mental health and wellbeing: Everyone I have come into contact with, either locally or through the protest groups are quite rightly going through a series of emotions right now. From anger to utter despair and it is very concerning. Some of the more vulnerable and elderly (Lincolnshire has a high proportion of retirees) are afraid and are not able to voice their views as well as others and perhaps do not have access to social media and technology to do so. Others despair that, despite their protests, they will fall on deaf ears. The WHO and the UK Government have both published research on the health risks posed living under pylons and whilst there is little obvious effect of exposure from low level electromagnetic fields (eg appliances in the home), it seems to me inconclusive on the risks of exposure to high levels. “There is no doubt that short-term exposure to very high levels of electromagnetic fields can be harmful to health.” [[2]](#footnote-2) Here the WHO quotes ‘short-term exposure’, however, those living under and close by pylons will be exposed on a regular basis thus increasing the risk. Furthermore, breakthrough research conducted by CORDIS, the European Union’s (EU) research and development platform in 2022, states that “living near high voltage electrical pylons substantially increases the risks of contracting cancer”[[3]](#footnote-3) This all takes its toll on our mental health and well-being and peoples’ lives will be genuinely ruined.
   2. Devaluation of properties: Studies have shown that properties located close to an electricity pylon can experience a decrease in value of up to 30%[[4]](#footnote-4). There is also a public perception on whether to buy a house with a pylon close by or on the land itself, making it hard to sell. My understanding is that the compensation available to home and landowners nowhere near covers the fall in value. The indirect consequences will hit peoples retirement plans, relocation plans (eg for education or jobs), mortgages and re-mortgages. How does NG feel about this – **please explain**? NG is effectively pushing local communities into deprivation. It is nothing short of another Post Office scandal.
   3. Noise pollution: Pylons and particularly sub stations can be noisy, especially at peak demand time. The constant buzzing will be a real nuisance to those living close by, for example, disturbance for those working shifts and people with sensitive hearing (quite common). One of your NG representatives at a consultation meeting suggested that we would ‘get used to it’ which suggests NG have underestimated the strength of feeling and have not taken our concerns seriously. Quite frankly, this is an insensitive comment that only serves to underline NGs mishandling of the non-statutory consultation process, for which we have only been given two months, as opposed to NG’s several years in planning. Totally unfair and somewhat underhand.
2. **Environmental** 
   1. Gibraltar Point Nature Reserve: The area is full of different bird species with many migratory birds using the reserve to over winter. Pylons can disrupt their ecological corridors that allow birds and other species to move freely between different habitats. These corridors, which span the whole of the Lincolnshire and Norfolk coasts are crucial for maintaining genetic diversity and population resilience. Disruption to these habitats will impact detrimentally on the ecological importance of this reserve. Donna Nook seal sanctuary: Britain has over 40% of the worlds seal population with many of them coming to Donna Nook and other parts of the Lincolnshire coast to breed. It is becoming an increasingly important for breeding. In addition, 47 species of birds breed regularly in the site, including some rare and uncommon migratory birds such as the snow bunting, the redshank and the lapwing. Disruption to these habitats will destroy these populations which the pylons will do just that, as they will have an indirect affect in terms of noise and ecological corridors. [[5]](#footnote-5)
   2. Other nature reserves All along the Lincolnshire coast and down to the Wash will also be affected as per (a) and (b) above include: RSPB Tetney Marshes, Rimac Nature Reserve, Saltfleetby & Theddlethorpe dunes, Sandilands Pit, Huttoft Bank Pit, Chapel Pit, RSPB Freiston shore, RSPB Frampton Marsh and, Moulton Marsh Nature Reserve.
   3. UNESCO World Heritage site: Importantly, the UK Government has confirmed its proposed list of UNESCO World heritage sites with the “East Atlantic Flyway, a migratory bird route over western parts of Europe including Yorkshire, Lincolnshire, Norfolk, Suffolk, Essex and Kent, joining the UK’s list in recognition of its vital importance to bird populations and wildlife. The area sees huge transient bird populations pass through every year as the seasons change.”[[6]](#footnote-6) These bird migrations land on the Lincolnshire cost as one of their first stopping points for over wintering. It is inconceivable that NG’s pylon project would go ahead given this environmentally important area. Interestingly, should NG be successful and the Lincolnshire coastline be subsequently granted UNESCO heritage status, NG would be forced to remove the pylons, at great cost and find an alternative. I am sure NGs Board and shareholders would not be very happy to see their shareholder value and dividend pay-out reducing given it has had a steady dividend growth over the last ten years. This is all notwithstanding the financial impact to PBT and, of course, the associated reputational risks.
   4. Agricultural farming land, the most valuable in the country: Lincolnshire farming land is vital for national food security, it produces around 25% of the UK’s food supplies and is vital for the future food supply chain and the Lincolnshire population. Ripping up land to make clearance for pylons will destroy habitats and years of effort farmers have made to enhance their land for both the benefit of wildlife and the food supply chain. Farmers already have a hard time, they do not need this, on the back of flooding, climate change, and the Viking Link which has already brought them so much disruption.
   5. Specific habitats such as:
      1. Bee hives:[[7]](#footnote-7) Pylons emit electromagnetic fields that disrupt the honeybees’ ability to pollinate nearby plants which reduces biodiversity in our area.
      2. Barn Owls are thriving in Lincolnshire. There are more barn owls in Lincolnshire than in any other UK county. Numbers are increasing thanks to efforts by farmers and others and we do not want to see this decline because of pylon noise. Barn owls have incredible sensitive hearing so the noise from the pylons will have a massive impact on their ability to survive. Barn owls are listed in law as a Schedule 1 protected bird species.[[8]](#footnote-8)
   6. Habitats Regulation Assessment (HRA) : My understanding is that NG should have prepared an HRA for each of the options. **Where is this**?
3. **Areas of outstanding natural beauty and associated sites**
   1. Visual Impact: NG states that there will be three pylons for every kilometre of line. That constitutes 140 km x 3 meaning 420 pylons. The visual impact of the pylons will quite clearly be overwhelmingly brutal. They will spoil the beauty of this landscape, largely untouched by humans for hundreds, if not thousands of years (given it is largely farming land and small villages) for the sake of taking the corporate easy way out. I do not think NG has any idea whatsoever as to the damage it will cause on this issue and I do not think they appreciate how dear it is to those of us who live here and those that visit year on year. I have attached at *Appendix A* some photos showing the natural beauty of the landscape as it is, has anyone from NG actually visited? From the top of the Wolds to the coast, the existing landscape is peaceful and serene. It is inconceivable that NG or anyone else for that matter could spoil these views. Furthermore, I do not understand why NG is removing pylons in other areas of the UK [[9]](#footnote-9). It states that the VIP is concerned with removing pylons in AONB, however, NG has removed pylons from other areas too. So, why is Lincolnshire being treated differently to other parts of the UK? What is the justification? In fact, NG has stated that as regards the Weston pylon removal, National Grid project engineer Ben Thorne said: “These works will not only improve the skyline of residential areas, but removing the pylons will enhance the stability of our network and mean it can handle the increasing demand for low carbon technologies, such as electric cars and heat pumps. This will future-proof supplies for residents and businesses in the area.” There are clearly contradictions in what NG is doing elsewhere in the country and what it plans to do in Lincolnshire. It seems that NG thinks Lincolnshire is a walkover. **Please explain**.
   2. Walking / National trails: There are over 35 walking trails in Lincolnshire as described in the Visit Lincolnshire webpage, including 10 coastal walks. This excludes the many public footpaths and rights of way that both local communities and tourists frequent. Clearing land for pylons will disrupt and destroy these walking trails, notwithstanding the appalling visual impact they will have. There are also many viewpoints along the trails that would be affected by subsections of pylons.
   3. Tourism: Lincolnshire relies on tourism as one of its sources of revenue, especially all of the towns and villages all along the Lincolnshire coast. “Greater Lincolnshire's Visitor Economy is currently estimated to be worth over £2.39bn per annum to the Greater Lincolnshire economy, supports at least 30,000 full time equivalent jobs (pre Covid-19 pandemic), and has long-term growth potential. Home to the Red Arrows, Lincoln Castle and Cathedral, and the Lincolnshire Wolds, as well as the vibrant coastal resorts of Cleethorpes, Mablethorpe and Skegness – the UK’s fourth most popular holiday resort – the area has a rich heritage, cultural and leisure offer.”[[10]](#footnote-10) There are many visitors that have permanent holiday homes here and those that visit year on year. If I were one of them, I would not want my views from my holiday home blighted by pylons. It would be devastating to see visitor numbers drop because they have decided to holiday elsewhere as this would have a devastating effect on the local economy. I also do not believe NG’s claim of creating jobs in Lincolnshire as part of the pylon initiative to compensate and I have seen no evidence to this effect, nor any guarantees, so far just platitudes from your representatives. What specifically is NG proposing and what guarantees can it make – **please explain**?
4. **Archaeological and heritage sites**
5. Archaeology: Lincolnshire is an extremely important county for archaeology. In 2022, it topped the table for the most finds in the UK (5,101).[[11]](#footnote-11) Therefore, the clearing of land and the destruction of surrounding areas will damage potentially valuable finds (monetary and historic).
6. Heritage sites: There are hundreds of heritage sites in Lincolnshire[[12]](#footnote-12). Please see *Appendix B* where you will find a map detailing the many monuments sited along the Lincolnshire coastline which will be affected by the pylons, either due to visual impact, land clearance which may damage or destroy, or reduction in visitor numbers due to degraded visuals.

Having read through the various options considered in your Network Options Assessment (NOA) and the CPRSS, there are many of us questioning why the following possibilities were not considered and appear to have been effectively discounted, as follows:

1. **Other options**
2. Viking Link: Why didn’t NG consider running additional cabling / tunnels alongside the Viking Link? Consultations on the Viking Link started in 2016[[13]](#footnote-13). As large scale projects do not happen overnight, there would therefore have been a lengthy period of time from project conception to non-statutory consultation in order to research, prepare the many consultation documentations and obtain funding and board approval, let’s say ten years[[14]](#footnote-14). Using this as a yard stick, as no documentation on this is in the public domain, I imagine initial concepts for Viking link might have been discussed around 2006. By comparison and using the same time scales, let’s say the Grimsby to Walpole project concept planning began around 2013, three years before non-statutory consultations on the Viking Link. There is clearly a feasible overlap to consider running both projects alongside each other and putting in place contingency planning for distributing additional electricity capacity, i.e. installing additional underground cables alongside the Viking Link. NG was fully aware that electricity demand and therefore distribution capacity would need to increase as it publishes ten year electricity forecasts. I remind NG that it first published an ETYS in 2012 and has done so in subsequent years. These forecasts clearly show an increase in demand and distribution capacity was required back in 2012 and again in the ETYS in 2015[[15]](#footnote-15) and again in the ETYS in 2017. So, the question is why didn’t NG have the foresight to forward plan? Certainly back in 2017, NG was fully aware of the additional capacity required and the stress that this would place on the existing network including that in the East Anglia / Humber region[[16]](#footnote-16). Please see *Appendix C* illustrating what I believe is an estimated but largely correct timeline.

Unfortunately, the horse has bolted, but the point I am making here is that this shows a considerable lack of insight and forward planning on NG’s behalf. Opportunities have been missed. What has NG’s Executive Committee and Board have to say about this? Did anyone consider this and if so what actions were taken? If no thought was given, how does NG explain the lack of forward thinking? **Please explain**.

1. Upgrading existing pylons**:** There is noconsideration in NG’s CPRSS of upgrading existing pylon links from either High Marnham / Cottam to Walpole. I raised this point with one of your representatives at a consultation meeting and was informed that the existing pylons do not have the strength to carry any additional capacity (more cables would be needed etc). I did enquire as to whether NG had considered strengthening existing pylons but was met with blank looks and an acknowledgement that it was a good point. Surely strengthening existing pylons would be cheaper than installing new ones and less disruption given the pylons and substations are already in place? **Please explain**.
2. Underground cabling: This option is unrealistic but wanted to set it out here as it could have been considered by NG but wasn’t, see point 5(a) above.
3. Subsea – Preferred option

In my view, this is the preferred and only real option. It mitigates all of the impacts in the CPRSS. There are already wind farms and subsea interconnectors in place, so the marine impact must have been overcome for that to happen. There is no visual impact, no environmental impact and no disruption to communities by putting subsea cabling in. So, the only rationale for not doing it is cost, which your representatives confirm is the case. By comparison,

* The Viking Link cost £1.8bn to lay 475 miles of underground cables
* The EGL1 project in Scotland is costing £1.8bn to lay 190km (118m) of subsea cable costing £1.8bn.

I do not understand why NG has costed the subsea option at £4bn for around 100 miles of subsea cabling. **Please explain**. Furthermore, NG’s preferred option ECO5 (Grimsby to Walpole) includes a capital cost of £1,000.5m and a lifetime circuit cost of £958m, totalling £1.958.5m for 140km (87 miles) of overhead cables. However, my understanding is that this does not factor in other costs such as compulsory land purchases, compensation etc. Thus, the £1.958.5m is not a true reflection of total cost. The numbers don’t add up? **Please explain**.

I have read through NG’s strategic objectives and its aims for being environmentally more friendly and greener. These objectives appear to be directly at odds with its plans to install pylons along an environmentally and ecologically important area, as follows:

1. **NG Strategic objectives**
2. UN Global Compact: NG has signed up to the United Nations Global Compact, which it states in NG’s Sustainable Development Goal 2018/2019 that “we are signatories to the United Nations Global Compact, which have a strategy to drive business awareness and action in support of achieving the Sustainable Development Goals (SDGs or Global Goals) by 2030. These goals promote prosperity while protecting the planet …….All [17] goals are important, and there are eight that are particularly linked to our role in supporting the economy, the environment, our people, and wider society, and against which we measure the overall Company performance:”
3. Life on Land (goal no.15): This states that NG aims to “ Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss”.
4. Supplier Code of Conduct: This states that “Environmental management and assessment is a key element of our Supplier Code of Conduct, which is updated annually and communicated to our suppliers during sourcing activities. Relevant elements include: use materials in a responsible way which does not affect the wellbeing of people, animals, and other living systems”.
5. Environmental Action Plan 2021-2026: This states NG’s aims of “Caring for the natural environment. We will value nature, and will protect and enhance it where possible using ‘natural capital’ and ‘net gain’ principle”. This includes: (i) “One of the most important challenges facing humanity, alongside the climate emergency, is the global biodiversity crisis. There is a severe decline in the natural ecosystems that underpin our global economies, regulate the climate and provide raw materials and essentials fundamental to life itself. Alarming statistics forecast the number of species at risk of extinction within the near future, and without appropriate action to prevent further loss and fragmentation of habitats across the globe, the negative impacts will have ramifications for this and future generations. The UK Government’s primary goal for environmental policy over the last few years has been the overarching ambition to “leave the environment in a better state for the next generation”, rightly emphasising the need to deliver environmental net gain”, and (ii) 10% Deliver net gain of least 10% or greater in environmental value (including biodiversity) on all construction projects (including those delivered by third parties building on our land).
6. Responsible Business Charter 2023: This Charter sets out a number of commitments, including, *inter alia*, commitment 2 that states NG aims to protect [the] natural environment by:

* 10% improvement - Restore the natural environment by 10% on the land we manage in the UK and [preserve the natural environment in the land we manage in the US][[17]](#footnote-17).
* The natural environment is in decline globally, despite society needing healthy, functioning ecosystems to survive and economic prosperity being inextricably linked to natural resources. We are committed to developing a more ambitious nature strategy and understanding how external drivers will influence our future plans; such as the COP15 Post-2020 Global Biodiversity Framework commitments, Science-Based Targets for Nature and the Taskforce on Nature-Related Financial Disclosures (TNFD). There are significant differences in the types of habitats and levels of biodiversity present across the geographies where we operate. Therefore, we will align our approach to regional priorities. This means for our UK operations, we will focus on restoring the natural environment, and for our US operations[[18]](#footnote-18), we will focus on preserving the natural environment. We will build on the progress we have already made by focusing on the areas of our business where we have the most material impact on nature: on the land that we own and through the delivery of our major infrastructure projects, both onshore and offshore, as part of the energy transition. Where we have an impact, we will leave nature in a more positive state than we found it, while ensuring alignment with the requirements of our regulators

1. Visual Impact Provision (VIP) Guiding principles: I understand this was set up in 2016 in relation to the removal of pylon in Areas of Natural Beauty AONB) although consideration was also given to extending this to beyond AONBs[[19]](#footnote-19) , as follows: “Consider widening the scope of the scheme beyond AONBs and National Parks to include, for example, World Heritage Sites, National Trails, coastal paths and areas of social deprivation.” This suggests that NG are concerned about the visual impact of pylons, so why put them in Lincolnshire? The issues are the same. **Please explain**.
2. Habitat protection programme: In the US.NG has launched this programme to monitor and protect local habitats. Why has no consideration being given to the natural habitats in Lincolnshire? **Please explain why Lincolnshire is different**.
3. Stakeholder Advisory Group (SAG) – My understanding is this group was established in relation to the VIP project. However, as pointed out above, the issues are the same. I also note in the SAG minutes that when determining whether to remove a pylon, an increased score would be given where “a viewpoint from a National Trail was affected by a subsection of pylons, this would have increased its score”. Has any such scoring system been undertaken with respect to the Grimsby to Walpole project? If not, why not? Surely, the same assessment processes should be used when removing pylons as well as installing them? In addition, have any of the stakeholders been contacted as regards the Grimsby to Walpole project? [[20]](#footnote-20)

My take on NG’s strategic objectives is that there is a strong emphasis on environmental solutions as the preferred option, specifically sources of energy which no one I think disagrees with. However, it is the distribution of energy [electricity] that is the issue as NG’s actions do not follow its words.

**Summary**

I understand the need to balance clean, environmentally friendly solutions vs costs and shareholder return, however, continuing with pylon installation instead of subsea cabling jeopardises fulfilling these objectives and consequently creates reputational and potentially future financial risk. NG is using old fashioned technology which is not appropriate in a modern world; we need to move forward not backward. We cannot be a first world country with second class technology. We should be leading from the front with creativity and innovation, showcasing the UK’s green credentials and ecologically sound solutions. NG is failing on this and it should be ashamed of itself. I urge NG to reconsider and sound out properly the subsea option.

Thank you for your time in reading this which I hope will enlighten NG as to the issues and struggles we are experiencing with NG’s pylon proposal here in Lincolnshire. I hope it will inform NG better and enable it to re-visit this in favour of the subsea cabling route.

Yours faithfully

Cc,

* Graham Stuart - MP for Beverly and Holderness and Minister of State for energy security and net zero.
* Victoria Atkins. Conservative, Louth & Horncastle. [victoria@victoriaatkins.org.uk](mailto:victoria@victoriaatkins.org.uk)
* Gareth Davis. Conservative. Grantham and Stamford. [gareth.davies.mp@parliament.uk](mailto:gareth.davies.mp@parliament.uk)
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* Ofgem.

Chris Baines Chair and leading environmentalist,

National Trust,

Campaign for National Parks,

Campaign to Protect Rural England,

Historic England,

National Association for AONBs,

National Parks England,

Natural England,

The Landscape Institute,

The Rambler Association,

Visit England

1. References to pylons in this document also includes sub-stations [↑](#footnote-ref-1)
2. World Health Organisation (WHO) – Electromagnetic fields / Key Points. [↑](#footnote-ref-2)
3. https://cordis.europa.eu/article/id/15541-research-breakthrough-on-health-effects-of-pylons [↑](#footnote-ref-3)
4. https://www.bbc.co.uk/news/uk-england-essex-61922067 [↑](#footnote-ref-4)
5. Lincolnshire Wildlife Trust [↑](#footnote-ref-5)
6. www.gov.uk/government/news/seven-sites-confirmed-in-the-running-for-unesco-world-heritage-status [↑](#footnote-ref-6)
7. New Scientist, 12th May 2023 [↑](#footnote-ref-7)
8. Royal Society for the Protection of Birds (RSPB) [↑](#footnote-ref-8)
9. NG, Visual Impact Provision (VIP). “A national programme to reduce the visual impact of existing high voltage power lines in protected areas across England and Wales. (a) Wales replacing with underground subsea cables. We’ve taken down 248 of 249 lattice pylons, including two lines between Nailsea and Portishead and those in Portbury Wharf Nature Reserve, and a line from across a residential area in Avonmouth.

   In September 2023, children and teachers at Avonmouth C of E Primary School and Daisy’s Nursery returned to a pylon-free playground after the pylon was removed during the school summer holidays. We are continuing our work at the school to upgrade forest and outdoor learning space. In early 2024, we’ll take down the one remaining lattice pylon near Sheepway in Portbury.” [↑](#footnote-ref-9)
10. [www.greaterlincolnshirelep.co.uk](http://www.greaterlincolnshirelep.co.uk) – visitor economy [↑](#footnote-ref-10)
11. British Museum as published in Lincolnshire World, 23 Jan 2024. [↑](#footnote-ref-11)
12. Lincolnshire Heritage Explorer [↑](#footnote-ref-12)
13. As referred to in NGs 2017 Electricity Ten Year Statement (ETYS) [↑](#footnote-ref-13)
14. HS2 concept proposed in Parliament in 2010, as a yard stick. [↑](#footnote-ref-14)
15. ETYS 2015 – Page 61, last para. States “So there is a driver to develop the network to increase the thermal capability of the circuits exporting power from North East England to the south of the country.” Page 73, last para states “So there is a driver to develop the network in the East England region, in order to ensure that it has sufficient capability to export the power safely and securely to the rest of the system”. Page 101 states “Developments in the East Coast and the East Anglia regions, such as the locations of offshore wind generation connection and the network infrastructure requirements, will have a significant impact on the transfer requirements and capability of boundary B9”. [↑](#footnote-ref-15)
16. ETYS 2017 states, Page 5 – “Large growth of around 5GW in low carbon generation and interconnectors in the north of England, combined with increased Scottish generation, will increase export requirements into the English Midlands. High growth in the next decade of up to 10GW in generation coming from offshore wind on the east coast connecting to East Anglia… transfer of power from this region to the south of England will risk stressing this region of the network. These changes are leading to high north-to-south transmission flows across Scotland and much of the north of England to meet demand in the Midlands and the south. “Figure B8.2 Required transfer and base capability for boundary B8, shows an increase in capacity from around 8/9MW to 14/16 in 2030MW. Figure B9.2 Required transfer and base capability for boundary B9 which shows an increase in capacity from around 8/9MW to 10/12 MW in 2030”. [↑](#footnote-ref-16)
17. Why only restore the natural environment in the UK, why not preserve it as well? [↑](#footnote-ref-17)
18. Per footnote 17. [↑](#footnote-ref-18)
19. VIP minutes 5th September 2018. [↑](#footnote-ref-19)
20. Chris Baines Chair and leading environmentalist, Ofgem, National Trust, Campaign for National Parks, Campaign to Protect Rural England, Historic England, National Association for AONBs, National Parks England, Natural England, The Landscape Institute, The Rambler Association, Visit England [↑](#footnote-ref-20)