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Ofgem  
9, Millbank  
London  
SW1P 3GE

Dear Sir or Madam

### **Call for Evidence on Electricity Distribution Business Plans for RIIO-2**

Friends of the Lake District (FLD) is a registered charity with more than 6,000 members. We represent the Campaign to Protect Rural England in Cumbria and are a member of the Campaign for National Parks. We actively campaign to reduce the visual impact of all overhead wires on the landscape. I work with the Distribution Network Operator (DNO) in our region, Electricity North West (ENW), National Parks and Areas of Outstanding Natural Beauty (AONBs) on specific undergrounding schemes.

Thank you for your letter of 6<sup>th</sup> December 2021 inviting views and evidence from stakeholders on final Business Plans. I have comments for **ENW's Business Plan**, specifically sections on undergrounding.

*Section 4.5 Delivering an environmentally sustainable network (p.75)* – Under improving the direct environmental impact (Section 4.5.2), we are wholly supportive of benefit 34 to remove overhead lines in beauty spots, where the “successful programme of improving visual amenity” is “maintained at current levels”, that is replacing 7 – 8 kms of overhead line with underground cables each year.

*Section 9.3 Our engagement methods (p.173)* – There is mention of charities and NGOs under “stakeholders”, their needs being a “focus on environmental targets” and that the plan delivers through outputs in the environmental action plan (see later) which shows “lots of ambition in these key areas” and “plans to continue extensive engagement throughout ED2”. Friends of the Lake District is part of an Undergrounding for Visual Amenity Steering Group with ENW, National Park Authorities, AONBs and landscape charities that meets annually to discuss and agree the undergrounding programme in the North West. All parties find this extremely useful.



There is a link on page 13 of ENW's Business Plan to **ENW's Environmental Action Plan** (Annex 13) where undergrounding is referred to in more detail...

*8. Looking after our natural environment – Goal 16 Remove overhead lines from National Parks and AONBs* – We are disappointed that “customers are not willing to pay for the expansion of the (undergrounding) scheme” (page 47), seeing it as “a lower priority” (page 46) and therefore ENW will not expand the scheme but “only spend up to the entitlement provided by Ofgem” (page 46). Nevertheless, we are pleased that ENW’s “long term aspiration is to remove all visually intrusive overhead lines” (page 46 – my underlining) from National Parks and AONBs. It is also encouraging that “engagement did show that (undergrounding) was acceptable to a large percentage of customers and stakeholders” (page 47) and that they do recognise that “overhead lines cause visual impact on the natural beauty of designated areas” (page 62).

We are pleased that, during RIIO-ED2, ENW will continue its programme from RIIO-ED1 “to meet annually with representatives from the designated areas to identify 7 – 8 kms of overhead lines per year to be undergrounded in their area” (page 47) and that at least activity is being maintained “at a similar level to RIIO-ED1” (page 47). We clearly support the benefits of the work for “enhancing views and protecting the natural beauty” (page 47) of the National Parks and AONBs. We also support that another benefit of this work is making “those parts of the network more resilient” (page 47) and benefitting “reliability by reducing exposure to overhead line faults, trees and storm damage” (page 47). This is particularly pertinent in the wake of extensive damage to power lines in Cumbria by Storm Arwen in November 2021 and the number of customers that were without power for up to a week. We agree therefore that the potential impact in RIIO-ED2 without intervention by undergrounding is “visual intrusion in otherwise picturesque landscapes, impact on migratory birds and reduced network resilience where overhead lines are damaged by storms” (page 57 – my underlining).

We hope that all these comments are useful as Ofgem considers ENW's final Business Plan and publishes a draft Determination this summer.

I look forward to hearing from you.

Yours faithfully

Amanda McCleery  
Overhead Wires Officer

