P L A C E



RIIO-ET3 Team 04/03/24

By email: [RIIO3@ofgem.gov.uk](mailto:RIIO3@ofgem.gov.uk)

Dear RIIO-ET3 Team

**RIIO-3 Sector Specific Methodology Consultation**

PLACE has been a consultee for National Grid (NG) since 2007 and has worked with a number of conservation organisations to reduce, particularly the visual impact, of national infrastructures

on the landscape. We believe that retaining, and being able to have access to, land which is not over dominated by human structures and control is crucial for the well being of us all and for many other species.

We are aware the new legislation - Levelling Up and Regeneration Act 2023 (LURA) is now relevant and increases the duties of public bodies in relation to care and enhancement of designated natural landscapes.

**ETQ11. What are your views on retaining funding to support mitigation projects that reduce the visual impacts of existing infrastructure in designated areas?**

Given that Ofgem already acknowledges the desirability of continuing the VIP project, with the new LURA legislation placing extra duties on public bodies, we would suggest this surely makes the continuation of VIP an imperative.

Although undergrounding of power lines is expensive we draw attention to an increasing number of factors in its favour:

1. Cables carry power more efficiently and have a longer life than ohls.
2. Cables underground or undersea are less dangerous to all species of animals including humans.
3. Electromagnetic cancer causing fields are considerably reduced.
4. Cables are safer from weather / climate extremes and lightning strikes. Ohls are more and more frequently being damaged as climate severity increases.

Note that ***all*** predictions of the pace of climate change by the IPCC are being proved to be too conservative. Ofgem and NG predictions of future scenarios and security of supply need to take account of these facts and fund as a matter of course more undergrounding.

1. District heating could be achieved by placing water pipes for cooling the cables alongside them and taking the warmed water for heating needs.
2. Underground cables are less vulnerable to acts of terrorism and / or war.
3. The health benefits of outdoor exercise are well researched. Equally well researched is the importance of the beauty of British landscapes in encouraging healthier lifestyles.
4. Similarly better cared for landscapes are likely to bring greater economic benefit and income from tourism.
5. Longer lasting infrastructure keeps landscapes peaceful for longer which is again a benefit to both wildlife and people.
6. If all cables were in surface troughs and surrounded by careful hedging and tree planting not only would any repairing of cables be eased but also much needed wildlife corridors would be created enabling more flexibility for animal movement.
7. The great variety and beauty of the British landscape is internationally renowned and is a very significant part of the British cultural identity as is our approach to caring for the land. These matters are intangibles but are important to our standing in the world. National Grid has made a very robust and exciting contribution to infrastructure upgrade with public consultation alongside and an 18% wildlife benefit at Peak East. These skills and experience are both laudable and exportable.

Were all the above benefits to be accurately accounted for, cabling is likely to be shown as more economically efficient than ohls.

Willingness To Pay

PLACE is in favour of new WTP research given the changed economic and energy supply circumstances. Also given the significant rise in understanding of the central role of the biosphere in supporting all life including our own it seems quite possible that an increased WTP will be uncovered.

We suggest to Ofgem that its very conservative response to the financial calculation of WTP in the earlier research for RIIO – ET1 , ET2 be amended to the actual figures the public asks for after the new research.

Note in RIIO ET1, ET2. Ofgem allowed only 50% - £1bn rather than the £2bn the public asked for.

Yours sincerely,



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