Dear Sir or Madam,

Please find below a response to this consultation by CPRE the countryside charity. We have only responded to Question 60.

CPRE has had a long interest in addressing the visual amenity issues that arise in the countryside as a result of electricity infrastructure development. Friends of the Lake District, which forms part of our wider network of local affiliated charities, led calls for the establishment of the visual amenity allowance in the early 2000s.

**Q60. Do stakeholders agree with retaining and strengthening the main components of the environmental framework from RIIO-ED2?**

1.            We welcome Ofgem’s proposal on p99 ‘to retain the main components of the environmental framework from RIIO-ED2’ and the Annual Environment Report (AER). The environmental reporting for ED2 included reporting on progress with undergrounding and visual amenity activities. We call on Ofgem to retain this element of the environmental framework for ED3.

2.            There is a strong level of support for undergrounding in Protected Landscapes. The long-term goal for visual amenity should be that, where practically feasible, all new and existing distribution and transmission lines run underground through Protected Landscapes or avoid these areas altogether. It is therefore essential that ED3 requires visual amenity allowances to be included in the DNOs business plans for the next price control period.

3.            There is now a significant body of evidence to demonstrate consumers’ willingness to pay for the undergrounding of overhead lines in Protected Landscapes.

4.            While much has already been done to reduce the visual impact of DNOs’ electricity infrastructure, there are still many more parts of our National Parks and National Landscapes which could benefit from the removal of overhead lines.

5.            The visual amenity allowance for distribution lines was first introduced in the 2005-2010 price control period and there are now a number of very successful examples of the positive impact this scheme has had on our most inspiring landscapes. For example, Electricity North West report that 145 kms of overhead lines have been removed, as part of their undergrounding and visual amenity programme, in the North West region alone in the last twenty years. The process also demonstrates the strong desire for undergrounding in designated landscapes as prioritisation is largely stakeholder-led, with some interest groups using surveys of local people to identify potential projects to be funded. There is huge opportunity to build on the work that has been undertaken to date during future price control periods.

We hope this response will help inform future policy development and would wish to be kept informed as to the next steps following this consultation.

With best wishes,

Paul Miner MA MRTPI FRGS

Head of Policy

CPRE