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Dear Anna Rossington

RIIO-ED1 Consultation

The Kent Downs AONB has been actively involved in DPCR4 and DPCR5 with the allowance for undergrounding overhead electricity lines in Areas of Outstanding Natural Beauty and National Parks. This work not only provides large scale landscape enhancement but also provides a valuable platform for us to engage with the general public, land owners, land management organisations and also for the protected landscapes to work in a productive partnership with the DNO.

In response to the consultation, we have concentrated our comments to the most relevant section to our work - Chapter 5 – Ensuring Output Delivery, in particular Question 3.

We are in strongly support in the continuation of an allowance for undergrounding of overhead wires in AONBs and National Parks. We support the intention to extend the price control period to 8 years. In the context of delivering undergrounding schemes, an 8 year period gives greater opportunity to plan and implement schemes.

In Chapter 5, paragraph 5.30 highlights the strong stakeholder support necessary. In the South East and Eastern regions this has worked extremely effectively in identifying activities and prioritising outputs. Any changes, as suggested, should take into account the exemplary work of this group. Allowing it to continue to work towards landscape enhancement and community benefit, would be greatly received both by the protected landscape and also the communities that live within them.

We urge Ofgem to consider how the distribution network on metal towers can be addressed in terms of undergrounding in National Parks and AONBs. The level of allowance in DPCR5 is not sufficient to underground this element of the distribution network due to the cost of dismantlement. The proposed allowance to underground the transmission network on metal towers will of course only be available to transmission operators. In order for the best possible benefits within

Anglesey
Arnside and Silverdale
Blackdown Hills
Cannock Chase
Chichester Harbour
Chilterns
Clwydian Range
Cornwall
Cotswolds
Gower
Cranbourne Chase and
West Wiltshire Downs
Dedham Vale
Dorset
East Devon
East Hampshire
Forest of Bowland
Howardian Hills
High Weald
Isle of Wight
Isles of Scilly
Kent Downs
Lincolnshire Wolds
Llyn
Malvern Hills
Mendip Hills
Nidderdale
Norfolk Coast
North Devon
North Pennines
North Wessex Downs
Northumberland Coast
Quantock Hills
Shropshire Hills
Solway Coast
South Devon
Suffolk Coast and Heaths
Surrey Hills
Sussex Downs
Tamar Valley
Wye Valley

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee promotes and co-ordinates the conservation of the Kent Downs AONB. Funding is provided by Natural England, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge and Malling. Other organisations represented on the JAC include the Environment Agency, DEFRA CLA, NFU, Kent Association of Parish Councils and Action with Communities in Rural Kent.



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our protected landscapes, it is essential that this anomaly is addressed through an increased level of funding within RIIO ED1 to deliver undergrounding schemes on all voltage levels of the distribution network.

The undergrounding of overhead cables is identified as a priority in the Kent Downs AONB management plan, therefore the continuation of this allowance is important to allow us to achieve this. We therefore fully support it's continuation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tim Owen', with a large, stylized initial 'T' and 'O'.

Tim Owen

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