

Please find below, the response on behalf of the Dedham Vale AONB and Suffolk Coast & Heaths AONB in respect of the RIIO-2 methodology consultation.

ETQ45. We welcome views on incentivising the TOs' engagement with stakeholders on the development of new transmission projects through our stakeholder engagement proposals, for example through the use of a survey.

Early and ongoing engagement with stakeholders on proposed transmission projects and options analysis is welcomed. A broader range of stakeholders and communities potentially affected by new build infrastructure could be reached through communication channels such as surveys as suggested. A named point of contact and personal liaison for schemes is considered essential.

ETQ46. Do you have views on retaining the existing scheme to mitigate the visual impact of pre-existing transmission infrastructure in designated areas? Do you agree that any decision to implement new funding arrangements should be subject to updated analysis around willingness to pay?

The existing Visual Impact Provision (VIP) project and in particular, the Landscape Enhancement Initiative (LEI), is making and has the potential to make significant enhancements to natural beauty in National Parks and Areas of Outstanding Natural Beauty. Schemes such as VIP and LEI take time to become established and we consider it essential that they are retained in the longer term in order to realise the ambition that brought them about in the first instance. The VIP and LEI offer a tangible means of addressing the primary purpose of the AONB designation, to conserve and enhance natural beauty, and, for the TO, they contribute towards their duty of regard as required under [Section 85](#) of the Countryside & Rights of Way Act. (This places a duty on any relevant authority, in exercising or performing any functions in relation to, or so as to affect, land in an AONB, to have regard to the purpose of conserving and enhancing the natural beauty of the AONB).

We recognise the development period required to deliver complex VIP projects and consider it important that this is reflected in the flexibility around attributing costs within one price control review period and into the next.

We agree that any decision to significantly change funding arrangements should be subject to updated analysis of willingness to pay.

ETQ47. Do you agree with our proposals to modify the implementation process by which funding requests for mitigation projects are submitted and approved?

We understand that it is proposed that the TO identifies schemes for delivery, and includes these in their Business Plans to be submitted to Ofgem for approval. In the case of VIP schemes, it could be said that previous work and ranking methodology can inform which schemes go forward for inclusion in the TO company Business Plans. We do not consider this to be as clear cut for the LEI schemes, where identification of individual schemes for inclusion in the Business Plans would require considerably more stakeholder engagement and project preparation to identify deliverable schemes.

We do not support the introduction of an expenditure cap of 2.5% of the £500 million VIP budget. This would see around a 50% reduction in funds available to deliver schemes and it fails to address the root cause of the lack of take up of the fund which in our view is the lack of project development funding available for the applicants, the time constraints built in to the current application process and the Ofgem assessment requirements. It is expected that a new initiative will take time to establish, and this appears to have been the case with the LEI,

however, as more schemes are approved and delivered, we would anticipate an increase in demand.

ETQ48. We welcome stakeholders' views on any other considerations they think are relevant to policy development for visual amenity issues in RIIO-ET2.

Proper provision and recognition of the resources required for the development of LEI schemes is lacking. The requirements to develop a workable LEI scheme are such that some designated landscapes may not see any proposals submitted simply because of lack of resource to develop schemes. This results in inconsistent delivery and an uneven spread of schemes based on a National Park/AONBs staff capacity – set against a situation where engagement does not accurately reflect the need and desire for mitigation works. To secure effective delivery and stakeholder engagement across the board, we consider it essential that this expenditure is recoverable. This matter has been raised previously and it continues to be of concern.

The matter of whether LEI schemes/or parts of LEI schemes set outside of the designated landscape boundary can be funded should be investigated on a case by case basis to ensure that the setting of the designated landscape is given proper consideration.

We remain concerned that an anomaly continues to exist in terms of addressing the adverse impacts resulting from those parts of the distribution network carrying 33 kV and 132 kV lines on metal towers (on National Parks and AONBs). Allowances available under RIIO ED 1 are insufficient to deal with the considerable cost of replacing such infrastructure with underground cable, and clearly they rest outside the scope of RIIO T1.

Thank you.

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