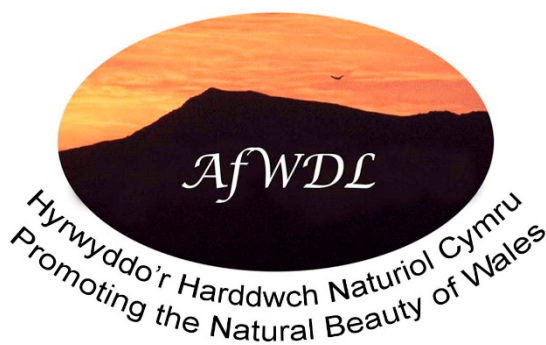


*Alliance
for
Welsh Designated
Landscapes*



*Cynghrair
dros
Dirluniau Dynodedig
Cymru*

Response to Ofgem RIIO-2 Sector Specific Methodology Consultation

13th March 2019

1. The Alliance is the Welsh organisation for Designated Landscapes (DLs) and represents the interests of National Parks, Areas of Outstanding Natural Beauty and other designated landscapes in Wales. The Alliance was formed in 2014 and brings together the expertise of the Brecon Beacons Park Society, Friends of Pembrokeshire Coast National Park, Cymdeithas Eryri the Snowdonia Society, Gower Society, CPRW, National Trust Wales, Cymdeithas y Cerddwyr/ Ramblers Wales, RSPB Cymru, YHA Cymru, BMC Cymru and Wildlife Trusts Wales. Collectively we have long-standing involvements in the legal and policy framework for designated landscapes, and experience of the management challenges they face.
2. The Alliance works in close partnership with the Campaign for National Parks (CNP) and we strongly endorse the comprehensive response submitted by the CNP to this consultation. Our additional comments below focus on the Welsh National Parks and Areas of Outstanding Natural Beauty (AONBs) in line with our remit.
3. Promoting the Natural Beauty of Wales is central to the Alliance's work and initiatives by Ofgem to reduce the visual impact of transmission infrastructure are strongly welcomed. The proposal to underground the National Grid line across the Dwyrdd estuary, Snowdonia, enabled by RIIO-1, has been widely supported by both local communities and visitors to the National Park. However, we are concerned that some of the changes proposed for RIIO-2 suggest that environmental considerations will not be given sufficient priority. We do not believe that any changes are needed to the existing outputs and would like the environmental outputs, including the one relating to visual amenity, to remain as they are. This would give recognition to Ofgem's

commitment to fully deliver it's environmental responsibilities under the Electricity Act 1989 and to its statutory duties relating to conserving and enhancing designated landscapes.

4. Response to ETQ46. We believe that it is imperative that the RIIO-2 Framework retains a provision for TOs to reduce the visual impact of existing transmission infrastructure in designated areas. A start has been made, but there are still many more areas of our Welsh designated landscapes that would benefit from the removal of overhead lines. This is evidenced by the extensive research commissioned by National Grid to assess the landscape and visual impacts of all the overhead transmission lines in designated landscapes in Wales and England. Retaining the existing scheme to mitigate visual impact will maximise the benefits from the preparatory work undertaken to date.

We are happy for this response to be made publicly available.

David Archer

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Alliance for Welsh Designated Landscapes