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Response to Ofgem RIIO-2 Sector Specific Methodology Consultation

11 March 2019

1. The Friends of Pembrokeshire Coast National Park (FPCNP) is an independent, voluntary charity committed to protecting, enhancing and conserving this iconic landscape for all to enjoy. Reducing the visual impact of transmission infrastructure has a huge impact on improving the sense of remoteness and natural beauty which are the hallmarks of these protected landscapes and we are concerned that some of the changes proposed in RIIO-2 do not fully prioritise the environmental considerations. Retaining an explicit reference to delivering a sustainable energy sector (as in RIIO-1) would clearly reflect Ofgem's statutory duties and provide a context within which value to customers can be delivered. Placing the environment at the heart of the process should be a stated responsibility, particularly in relation to conserving and enhancing designated landscapes.
2. The Friends work closely with the Campaign for National Parks and we strongly endorse their comprehensive response to this consultation. CNP have been closely involved with this process throughout and their focused response to this consultation is fully supported by FPCNP.
3. We are also a member of the Alliance for Welsh Designated Landscapes which brings together a wide range of organisations and expertise concerned with the management of protected landscapes across Wales. We fully endorse and support their response to this consultation.
4. Response to ETQ46. We believe the existing scheme to mitigate the visual impact of pre-existing infrastructure in designated landscapes should be retained. This is a long term ambition which has wide public support as evidenced through 'willingness to pay' surveys and demonstrates the willingness of Ofgem to fulfil their statutory duties. The burying of cables on Strumble Head within the Pembrokeshire Coast National Park was an example of a scheme which provided clear and popular benefits.

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The Friends is an independent voluntary charity committed to help protect, conserve and enhance the Pembrokeshire Coast National Park for all to enjoy
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