

Dear Sir/Madam

**Re: RIIO-ED2 Sector Specific Methodology Consultation**

I am responding to your consultation on behalf of two national landscapes – Dedham Vale Area of Outstanding Natural Beauty (AONB) and Suffolk Coast & Heaths AONB. I am also a member of the South East and East of England Regions Protected Landscapes: Undergrounding of Overhead Lines Project Steering Group. This Steering Group's objective is to agree a portfolio of undergrounding projects within the protected landscapes contained within the UK Power Networks licence areas, and in doing so make maximum use of the Ofgem undergrounding allowance for the current period.

Having looked at the RIIO-ED2 Methodology Consultation, in particular the Environmental Proposals in Annex 1 relating to Undergrounding in areas of outstanding natural beauty and national parks (pg. 151-154) we have the following comments for your consideration:

**Consultation Question OUTQ62. Do you agree with our proposal to retain the visual impact allowance for RIIO-ED2?**

Dedham Vale Area of Outstanding Natural Beauty (AONB) and Suffolk Coast & Heaths AONB strongly supports the retention of the visual impact allowance for RIIO-ED2.

Overhead electricity infrastructure is a key detractor from the natural beauty of our nationally important landscapes. Investment to remove pre-existing overhead lines enhances both the landscape and the visual amenity for those who live in, work in and visit these outstanding places.

Working with landowners, local stakeholders and UK Power Networks we have delivered tremendous undergrounding schemes during ED1. We witness first-hand the positive effects this work has on local people. For example, Catherine Lindsay-Davies from Shingle Street in Suffolk Coast & Heaths AONB cried with happiness whilst watching the last pole being removed saying *"The residents of Shingle Street are delighted that this project has been completed and that the landscape has been restored to its natural and unspoiled beauty, and for the beneficial impact on our wildlife"*

We feel it important to note that although there currently appears to be an underspend in EPN portion of the allowance, the ED1 fund has been fully allocated to undergrounding projects which UK Power Networks are fully committed to deliver by the end of ED1.

**Consultation Question OUTQ63. Do you agree with our proposed approach to setting a funding pot for the visual impact allowance for RIIO-ED2?**

Yes, Dedham Vale Area of Outstanding Natural Beauty (AONB) and Suffolk Coast & Heaths AONB supports the proposed approach to setting a funding pot for the visual impact allowance for RIIO-ED2. However, we do have some additional points for your consideration:

1. We would ask if the steadily rising costs of delivering undergrounding projects could be reflected in the total visual impact allowance offered in ED2? This increased allowance would help ensure that going forward, at least equal amounts of excellent projects can continue to be delivered.
2. We would ask if multiple DNO's are in one ownership (in our case, SPN and EPN in the ownership of UK Power Networks) whether there could be some level of flexibility or fluidity of an agreed portion of the allowance (for example, 20%) between those DNOs if agreed by the local stakeholder / Steering Group?
3. Further to the above, we would ask whether it is possible to have some level of flexibility of an agreed portion of the allowance (for example, 30%) between DNOs in differing ownership

should it look like the allowance will not be spent in that DNO within ED2 and if agreed by the affected local stakeholder / Steering Group? As the allowance is a 'use it or lose it' an underspend would be triggered at a set time before the end of the allowance period to avoid the allowance being lost altogether. We believe this fluidity is justified as we know that the general public travels considerable distance from elsewhere within England to visit and holiday in our National Parks and AONBs.

4. To date the majority of the Ofgem allowance has been spent on undergrounding 11kv, low voltage plus much smaller lengths of 33kv network. However, our protected landscapes are also impacted by higher voltage wires including 132kv wires on large steel towers which have widespread landscape impacts and affect the visual amenity for a large number of people. There is a great aspiration to remove sections of the existing 132kv network but the costs associated with undergrounding this higher voltage network are considerably higher per km than the 11kv network. Progressing one 132kv scheme in just one protected landscape could potentially use the majority of the ED2 allowance for the whole DNO. We would therefore ask if an additional allowance could be specifically allocated by Ofgem to remove 132kv network in our nationally important landscapes?

I hope the above response is helpful and would also like to extend an invitation to Ofgem to see first-hand the benefit that the undergrounding allowance brings to the UK's national landscapes.

Yours sincerely  
Claire