

**FAO James Veaney**

I am responding to your consultation on behalf of the Chilterns Conservation Board, representing the Chilterns AONB, one of 61 protected landscapes in the UK (46 AONBs and 15 National Parks). I am also a member of the Natural England chaired steering group that works with UKPN on the Visual Amenity provision for the EPN and SPN protected landscapes. The steering group and other individual members of the group will also be responding to your consultation. Fiona Campbell, OFGEM Senior Policy Analyst, kindly highlighted the relevant questions for our attention.

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

The Chilterns Conservation Board value the visual impact allowance and the opportunity it provides to enhance the beauty of our protected landscape – one of our statutory purposes. As one of the protected landscapes surrounding London, and served by the London underground, many visitors enjoy the recreation opportunity the AONB provides. We currently have 2 undergrounding proposals underway with UKPN that have potential to directly benefit over 1 million people per year (Dunstable Downs has recorded over 750,000 visitors annually and the Chess Valley Walk between Latimer and Chenies is the most popular promoted walk within the Chilterns AONB.

in addition, removal of overground electricity infrastructure benefits our cultural heritage (improving the setting of scheduled monuments and listed buildings) and improves biodiversity (the Latimer - Chenies scheme will remove overhead lines crossing the River Chess that have frequently caused bird strike fatalities).

We and other protected landscapes would like to make more use of the allowance though, as ever with limited resources, we can only devote so much time to identifying and gaining support for proposals, as we cannot at this time claim for a dedicated officer resource from the allowance.

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

The Conservation Board agrees with the Ofgem funding approach to this allowance and looks forward to a continued constructive working arrangement, through the NE chaired UKPN undergrounding steering group, in identifying and bringing forward undergrounding proposals in the EPN and SPN regions. The Chilterns AONB also hosts SSE who operate this allowance in a different way and we will continue to seek opportunities to promote proposals in the area they cover too.

We would like to encourage far better take up of the allowance though recognise that this is in part down to securing resources and commitment for adequate support of the allowance both within protected landscapes and the DNOs that seek to fulfil the allowance.

I hope the above brief response is helpful but would also like to extend an invitation to Ofgem staff, especially those who can easily commute to us from London, to see first hand the benefit that the undergrounding allowance brings to the UK's areas of outstanding national beauty.

With best wishes,

Neil

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