

SW Undergrounding Powerlines Steering Group response to RIIO-ED2 consultation

This response is on behalf of the South West Steering Group for the Western Power Distribution Undergrounding Powerline programme

I write to you as Chair of the SW Steering Group for undergrounding LV powerlines in the South West. This group is a partnership arrangement that oversees applications for the undergrounding programme and its representatives come from the AONBs and National Parks in the South West, and from the National Trust. It has been in place since 2010 and has established a successful and positive working arrangement with Western Power Distribution to ensure the delivery of the Ofgem allowance for undergrounding in the region.

This group oversaw the implementation of 16.6km/£1.634m of powerlines in the ED1 (2010-2015) programme and has so far overseen the delivery/commitment for 20.32km/£2.433m of powerlines in the 2015-2023 period.

The SW Steering Group has developed a guidance document and application process that has been refined over the years and is a positive example of public/private sector collaboration. This sits alongside the agreed Policy for assessing schemes under WPD and is attached to this response.

We anticipate this approach is replicated in other regions but there has been little opportunity for liaison on this to share learning and reinforce good practice. We suggest this should be an area that is encouraged and supported under the future programme. It would also assist in ensuring there was a consistent approach to assessment. Schemes could be compared across regions and the process could also assist in illustrating the overall value/benefit of the schemes delivered across each region in monetary, biodiversity and landscape value. As a matter of interest, the current suite of AONB KPI's reported to Defra include powerline removal.

Arriving at or indicating a programme value for each DNO/region is clearly not a straightforward process. Using resident population as part of the calculation potentially skews calculations in favour of regions with greater resident populations. We suggest that consideration is also given to the significant population increase (as in visitor numbers) the SW experiences in the national holiday periods, particularly the summer and particularly in and around AONBs and National Park areas. These are the periods when residents from the more populous regions get out into the wider countryside beyond their towns and cities and experience our outstanding landscapes. It is the experience of these very areas that influence the willingness to pay for undergrounding. The additional value/benefit therefore that this presents in terms of public goods resulting from undergrounding schemes could be factored in.

We would not support setting price controls. Regarding future programme schemes and delivery, the reality is that all undergrounding schemes are inherently complex and challenging to establish or commit to, especially years in advance. Time and resources both preclude forward commitment. Indicative sums or indeed potential sites can be given and we are currently looking at 'pipeline' projects in the SW region for that very reason. But until funding is certain, liaison is actually underway and details can be talked through with individual parties and landowners, no scheme can be guaranteed to progress. From experience, the more pragmatic approach is as has been used in the current programme. A total sum is agreed through an agreed national calculation and funding is allocated through an approval process to schemes as they develop. By having an established and experienced steering group, an appropriate approval process and a network of communication and liaison, programmes can be delivered effectively and efficiently.

Consultation Questions

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

We fully support the proposal to retain the visual impact allowance for RIIO – ED2, based on the positive joint working and delivery of visual improvement schemes across the SW region during the delivery of the RIIO – ED1

programme, producing significant results for our protected landscapes. The key benefit of the current scheme is that it is relatively flexible and in our 10yrs of experience has worked extremely well. WPD and the SW Steering Group consider this process the most appropriate and cost-effective use of the funds to maximise the benefits in terms of visual amenity within our AONBs and National Parks.

We support the proposal to enable a percentage of this allowance to be used in the immediately adjacent area to the AONB/ NP to help ensure, where appropriate, that the visual enhancement responds to the setting of the protected landscape and not simply a geographical boundary.

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

We are concerned by this approach, particularly in relation to the 'use it or lose it' approach being put forward. From our own experience in the SW, the length of time needed to bring some schemes from the development proposal phase through to delivery on the ground can be lengthy and, in some cases, unclear in terms of the completion and delivery of fully functioning replacement infrastructure. This can be compounded by a lack of clarity around some of the costings at outline and detail stages and what the alternatives worthy of consideration are in order to deliver 'value for money' for all stakeholders in the process.

We would suggest consideration of allowances is not based solely on a proposed number of schemes or potential projections but on an allocation using an assessment model that incorporates resident population, visitor numbers and length of line in region/AONBs/NPs.

In summary we agree the visual impact allowance should be retained. We concur the RIIO-ED1 programme scheme has worked well and agree it should be retained for RIIO-ED2.

Further comments:

Shared good practice: Consideration should be given to the opportunities to share good practice and networking between DNO delivery groups. The continued refinement of the assessment, application and delivery process by the SW Steering Group is a very positive working example of how to work in partnership across the private and public sectors, delivering for all protected landscapes.

Shared Infrastructure: The experience of the WPD SW Steering Group is that the public funding invested in the delivery of undergrounding schemes would be more comprehensive in achieving increased visual enhancement if partnership working from the telecoms industry was an integral part of this delivery. Where infrastructure is shared and planning for the continued roll out of fibre provision to the rural network, this could help deliver even greater results in many key locations.

Stakeholder engagement: Continued stakeholder engagement with the WPD is important in maintaining the importance and benefit of supporting protected landscapes and just what this means in the context of the south west region.

Forward Planning for Net Zero and Climate: The consultation outlines that DNO's will be expected under RIIO – ED2 to prepare Environmental Action Plans, outlining their activities towards the realisation of an environmentally sustainable network to meet their Net Zero targets and to deliver on climate change and renewable energy. Is there an opportunity for the SWPLG Steering Group to be involved to contribute to achieving a balanced approach on what this might look like in the protected landscapes context?

Broadening of Scope of Visual Improvement Works: The ability to use the funding to deliver mitigating alternatives to undergrounding (relocation of lines/ camouflaging of infrastructure) is worthy of further clarity and is something it would be good to have further engagement on to ensure these are specific to the site context specific and represent

an acceptable alternative. Our experience is that small changes to colours and design can result achieve better outcomes for maintaining landscape character.

Financial Reporting in Ofgem Consultation Document: We have concerns around the figures outlined in the consultation and how this appears in terms of allowance, spend and delivery, particularly in relation to the south west region. It may helpful for the consultation to state when these statistics date from as it does not appear to portray an accurate picture of what has actually been delivered here for the south west with obvious implications for any future 'use it or lose it' possibilities.

A handwritten signature in black ink, appearing to read 'Chris Woodruff', with a long horizontal stroke underneath.

Chris Woodruff

Chair

Western Power Distribution (South West)
Undergrounding Powerlines Steering Group

Members of the SW Steering group

Dave Edgecombe – North Devon AONB
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