

## **Historic England's response to the Ofgem consultation on RIIO-2 methodology**

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Digital, Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

We welcome the opportunity to submit a response on the following points. As this is a very extensive consultation, we have confined ourselves to those few questions which are relevant to our locus.

Visual amenity impacts of transmission infrastructure:

*ETQ46. Do you have views on the retaining the existing scheme to mitigate the visual impact of pre-existing transmission infrastructure in designated areas? Do you agree that any decision to implement new funding arrangements should be subject to updated analysis around willingness to pay?*

We strongly believe that the existing scheme should be retained. Given the success of RIIO-ET1 in relation to the historic environment, we consider it important that similar provisions continue into RIIO-ET2. More details and examples are given below.

*ETQ47. Do you agree with our proposals to modify the implementation process by which funding requests for mitigation projects are submitted and approved?*

We agree with the proposed modifications, as long as this will not impact on the ability to allow new projects which are not current candidate projects (see our comments on World Heritage Sites below).

*ETQ48. We welcome stakeholders' views on any other considerations they think are relevant to policy development for visual amenity issues in RIIO-ET2.*

We are a member of the National Grid Visual Impact Provision (VIP) Stakeholder Advisory Group, and have welcomed engagement with it. As a member, Historic England (previously English Heritage) has helped National Grid to develop the VIP project. One example of this relates to the landscape of the Dorset Area of Outstanding Natural Beauty (AONB) with its outstanding archaeological heritage. We helped develop the detail of the VIP project to bury overhead power lines along a five-mile (8km) stretch of the county near the villages of Martinstown and Winterbourne Abbas, which will remove about 20 pylons and the overhead lines constructed between 1965 and 1969. This will be highly beneficial to the historic

environment. We are working on other projects which will also benefit the historic environment elsewhere in the country.

However, we believe the scope of the scheme should be extended to include World Heritage Sites (we mentioned these in our submission on RIIO-ET1 in 2012). Given the fact that there is a good degree of overlap between AONBs, National Parks and WHSs, we do not believe this will cause problems, and may allow significant benefits to flow to these highly important sites.

We wish to further embed environmental issues (including the historic environment) into all plans, programmes and projects, with better links between the National Grid and the Distribution Network Operators in future rounds of the VIP Project which would be mutually beneficial.