

Cranborne Chase Area of Outstanding Natural Beauty



AONB Office, Shears Building, Stone Lane Industrial Estate,
Wimborne, BH21 1HB Tel: 01 725 517417
Email: info@cranbornechase.org.uk Web site: www.ccwwdaonb.org.uk

Michelle Clark
VIP Project Manager
Camargue

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RIIO2@ofgem.gov.uk

Dear Michelle

Ofgem Consultation on RIIO 2 Methodology

1. Thank you for the opportunity to comment on the RIIO 2 documents. Having looked at the basic document and the electricity transmission document it seems that a more explicit consideration of Areas of Outstanding Natural Beauty, National Parks, and countryside areas generally, would be beneficial.
2. Annex A to this letter sets out the national status and importance of AONBs in general and in this AONB in particular. Annex B sets out the composition of this Cranborne Chase AONB Partnership.
3. A lower carbon economy seems to be moving towards an increased reliance on electricity and therefore, in relation to the consultation, there is a need for increased reliability in supply. This AONB is not untypical of countryside areas in that there is a relatively small population, some 32,400, scattered across a substantial area of 983 sq km. This scattered population provides challenges for the consistent supply of electricity whilst minimising landscape and environmental impacts.
4. Within the nationally important landscapes of the AONB there is also potential conflict between the purposes of designation and local generation of electricity either for immediate consumption or for feeding into the network.
5. Urban situations, where the majority of people reside, are much more concentrated and therefore present a different set of issues. Nevertheless, in an urban situation it is more a case of supplying high quantities of electricity to relatively restricted areas, whereas in the countryside situation the issues revolve around continuity of supply of relatively small quantities of electricity over a large area and widely distributed consumers.

6. I note that in terms of environmental pollution and greenhouse gas effects the leakage of sulphur hexafluoride is a significant environmental issue. Questions ETQ 39 to 42 focus on this matter. The view of this AONB Partnership is that whilst all operators aspire to the highest standards a mix of rewards and incentives for controlling sulphur hexafluoride leakage seems to be a way forward.
7. I see that a discussion of 'visual amenity impacts of transmission infrastructure' starts at paragraph 4.85 but there does not appear to be any consideration of other landscape impacts or biodiversity impacts. I am mindful that there can be collisions between birds and the transmission infrastructure and that the ground beneath a transmission route is regularly managed to keep down tall vegetation. Those corridors are of not insignificant width and can, therefore, have impacts on habitats (in both positive and negative ways), soils, and visual amenity.
8. Question ETQ 45 relates to new transmission projects and clearly the assessments of potential routes, and the extent to which they go underground or overground, needs to be considered. Landscape character studies and landscape and visual impact assessments and appraisals are likely to be key tools in this process. It should be recognised that there may be occasions when the impacts on a sensitive area cannot be completely avoided. In that case the hierarchy of avoid, mitigate, and compensate should come into play. In relation to this AONB we have experience of one of the water companies where a strategic pipeline had to cross the AONB. Whilst considerable mitigation work was undertaken it was accepted that all disturbances to the AONB and its population would not be fully anticipated or covered and a compensation payment was made. That payment was used to support a farm conservation officer who carried out a variety of biodiversity and landscape projects on farmland in the vicinity of the route. As you may know all AONBs have to have a Management Plan and both mitigation and compensation could be aimed at achieving AONB Management Plan aims and objectives.
9. Question ETQ 46 relates to pre-existing infrastructure in designated areas and whilst this AONB has short lengths of high voltage transmission cables it, nevertheless, agrees that there should be a scheme to mitigate visual impacts of pre-existing transmission infrastructure. However, the scope of these schemes should be extended to lower voltage infrastructure as there are extensive areas through this AONB where the landscape character and visual amenities are compromised by 33kv and more substantial infrastructure despite the AONB only being impacted upon by short lengths of 400kv. Indeed, the multiple lower voltage cables in some localities cause considerable visual intrusion and this AONB is firmly of the view that these sub-400kv infrastructure should be included in the mitigation scheme.
10. Regarding the question about funding requests (ETQ 47), this AONB strongly advises that any scheme should be kept as simple as possible. It should also be clear that funds are spent on schemes rather than complex and involved application and assessment process. As mentioned above, schemes should be extended to include the lower voltage transmission and distribution infrastructure.
11. I note that paragraph 4.111 relates to a proposal to retain the scope of the scheme to National Parks, AONBs and National Scenic Areas. It is widely

recognised in the family of protected landscapes that views to and from those special and sensitive landscapes are important both in reality and experientially. The scheme should, therefore, include those elements of transmission infrastructure that fall within the setting of National Parks, AONBs and National Scenic Areas rather than just within the defined, statutory, boundaries. Including such elements of the infrastructure within the scheme could help to mitigate those transmission routes that, for whatever reason, follow a route just outside designated areas but nevertheless have a significant visual impact on those parts of those statutory protected landscapes.

12. Thank you for the opportunity to contribute to the consultation and I hope that these comments are helpful to you. I would, of course, be happy to discuss the various points in greater detail if that would be helpful to you.

Yours sincerely

Richard Burden

Richard Burden BSc DipCons MSc FLI PPLI
Principal Landscape and Planning Officer (part-time Monday to Wednesday)

For and on behalf of the CCWWD AONB Partnership
richardburden@cranbornechase.org.uk

ENCS: Annex A AONB status and significance
Annex B Cranborne Chase AONB Partnership Organisations

Annex A

AONB status and significance

The Cranborne Chase and West Wiltshire Downs AONB is nationally important. It has been designated under the National Parks and Access to the Countryside Act 1949 to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary, and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage.

It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage assets and environmental capital.

Local government (including planning authorities), Ministers of the Crown, individual councillors, any public body and their employees, statutory undertakers, and holders of public office also have a statutory duty in section 85 of the CRoW Act to have regard to the purposes of AONB designation, namely conserving and enhancing natural beauty, in exercising or performing any functions in relation to, or so as to affect, land in an AONB.

This [AONB's Management Plan](#) is a statutory document that is approved by the Secretary of State and is adopted by the constituent councils. It sets out the Local Authorities' Objectives and Policies for this nationally significant area, as required by section 89 (2) of the CRoW Act. The national Planning Practice Guidance [Natural Environment paragraph 004] confirms that an AONB and its Management Plan are material considerations in planning.

The National Planning Policy Framework (2018) is clear that the 'presumption in favour of sustainable development' does not automatically apply within AONBs, as confirmed by paragraph 11 footnote 6, due to other policies relating to AONBs elsewhere within the Framework. Paragraph 11 (b) indicates that for plan-making being in an AONB 'provides a strong reason for restricting the overall scale, type or distribution of development.' It also indicates in 11 (d) that for decision-making the application of policies in the NPPF that protect areas such as AONBs 'provides a clear reason for refusing the development proposed.'

NPPF paragraph 170 states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, which include AONBs, in a manner commensurate with their statutory status. Paragraph 171 explains that plans should distinguish between the hierarchy of international, national and local sites whilst taking a strategic approach to enhancing habitats and green infrastructure, and planning for the enhancement of natural capital across local authority boundaries.

It is explicit (paragraph 172) that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty. The conservation and enhancement of wildlife and cultural heritage are important considerations in these areas. Furthermore, the scale and extent of development within these designated areas should be limited.

More detailed information in connection with AONB matters can be found on the AONB [web site](#) where there is not only the adopted AONB Management Plan but also Position Statements and Good Practice Notes ([Planning Related Publications](#)). In particular when considering construction within the AONB I would draw attention to our [Good Practice Note on Colour in the Countryside](#)

As you may be aware, the AONB is concerned about light pollution. Any external lighting should be explicitly approved by the Local Planning Authority and comply with the [AONB's Position Statement on Light Pollution](#) and the more recent [Good Practice Note on Good External Lighting](#) and [Paper by Bob Mizon on Light Fittings](#).

This AONB is, as I expect you know, in one of the darkest parts of Southern England and hence the visibility of stars and, in particular, the Milky Way, is a key attribute of this AONB. Development that could contribute to light pollution, and hence impact adversely on those dark night skies, has to be modified so that such impacts are eliminated.

Greater details of the landscape, buildings and settlement characteristics can be found in the [Landscape Character Assessment 2003](#) and the [Cranborne Chase and Chalke Valley LCA 2018](#). Those documents are available and can be viewed in [FULL](#) on our [web site](#).

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Annex B



Cranborne Chase Area of Outstanding Natural Beauty

AONB Office, Shears Building, Stone Lane Industrial Estate, Wimborne, Dorset BH21 1HD
Tel No; 01725 517417 **Email: info@cranbornechase.org.uk**

The Cranborne Chase Area of Outstanding Natural Beauty Partnership Board is made up of the following Partner Organisations

Unitary, County, and District Council Membership (1 Member and 1 Officer Representative each)

- Wiltshire Council
- Dorset County Council
- Hampshire County Council
- Somerset County Council
- East Dorset District Council
- North Dorset District Council
- New Forest District Council
- Mendip District Council
- South Somerset District Council

Other Organisations

- | | |
|--|---------------------|
| • Natural England | (2 Representatives) |
| • Historic England | (1 Representative) |
| • Campaign to Protect Rural England | (1 Representative) |
| • Cranborne Chase Landscape Trust | (1 Representative) |
| • Forestry Commission | (1 Representative) |
| • The Country Land and Business Association | (1 Representative) |
| • National Farmers Union | (2 Representatives) |
| • Community Representatives from the Wiltshire and Dorset Associations of Town & Parish Councils (ATPCs) | (2 Representatives) |