

High Weald Joint Advisory Committee

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www.highweald.org

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Ofgem

Emailed to RIIO2@ofgem.gov.uk

Dear Sirs,

RIIO-2 sector specific methodology consultation

Please see below our response to the relevant questions in Ofgem's consultation on RIIO-2 methodology.

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?

The existing Visual Impact Provision (VIP) project and in particular, the Landscape Enhancement Initiative (LEI), is making improvements to landscape character and natural beauty in the High Weald AONB and has the potential to make many more and on a greater scale. The projects are a welcome initiative and represent substantial investment in the purpose of AONBs, that is to conserve and enhance the natural beauty, wildlife and cultural heritage. To retain the existing scheme would build on the work already undertaken and lead to important mitigation of the visual impact of pre-existing transmission infrastructure over a wider range of projects in AONBs.

To maintain the transparency which has led the current VIP project and LEI process it would seem sensible to update analysis around willingness to pay from consumers. As this formed part of the genesis for the project this would be a logical step.

With potential undergrounding projects there is a long lead in time which may span more than one price control period. If the VIP project were to be extended into a second price control period there would be greater flexibility to allow potentially complex projects to proceed to completion over a longer time frame.

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

The proposed modification of the LEI application and approval process is supported.. The proposal that the TOs work with AONBs throughout the LEI application process with Ofgem only being involved at the very end of the process with the statutory licence advertising period (4 weeks), is welcomed as this will help

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West Wiltshire Downs
Dedham Vale
Dorset
East Devon
Forest of Bowland
Howardian Hills
High Weald
Isle of Wight
Isles of Scilly
Kent Downs
Lincolnshire Wolds
Llyn
Malvern Hills
Mendip Hills
Nidderdale
Norfolk Coast
North Devon
North Pennines
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Northumberland Coast
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speed the application process up and give more certainty as to when funding will be available.

The setting of an expenditure cap to 2.5% of the £500 million budget for the VIP project would lead to £12.5 million for the LEI fund in the second price control period. This is substantially less than the £24 million currently available. It is known that take up of the LEI fund so far has not been as high as was hoped for but with the streamlining of the process and also the fund becoming better known across the protected landscape family, there is potential for increasing the take up of the fund.

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

It would be very helpful for the LEI to fund the preparation stage of the applications, as happens with other funding bodies such as the Heritage Lottery Fund. This would help the resourcing of officer time at the AONBs, which usually have a very small staff resource. This would improve the uptake of this scheme from AONBs.

Yours sincerely,

Claire Tester MRTPI
Planning Advisor, High Weald AONB Unit
Advising on the management of a nationally important landscape

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Background Information about the High Weald AONB



The High Weald was designated in 1983 as an Area of Outstanding Natural Beauty. It is an exceptionally beautiful medieval landscape covering 564 square miles across the counties of East and West Sussex, Kent and Surrey.

The High Weald AONB Joint Advisory Committee is a partnership established in 1991 of 15 local authorities, Defra, Natural England and organisations representing farming, woodland, access and community interests. The JAC is responsible for publishing and monitoring the statutory AONB Management Plan. The JAC is supported by a small, dedicated staff team, the High Weald AONB Unit, which provides advice on how to conserve and enhance the AONB. The advice provided by the AONB Unit assists public bodies and statutory undertakers to meet their duty as set out in Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of AONBs in making decisions that affect it.

Unlike National Park authorities, the High Weald AONB Unit is not a statutory body but an advisory one. It is not a local planning authority and the responsibility for determining planning applications remains with the 15 local authorities. The AONB Unit is not a statutory consultee on planning matters and it remains each local planning authority's decision whether or not they seek its advice on a particular planning application.

The scope of the advice in this letter is set by the statutory High Weald [AONB Management Plan](#), which has been adopted by all partner authorities, as 'their policy for the management of the area and for the carrying out of their functions in relation to it'.

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The High Weald Joint Advisory Committee is a partnership between: East Sussex, West Sussex, Kent and Surrey County Councils; Horsham, Mid Sussex, Tandridge, Sevenoaks, Wealden and Rother District Councils; Tunbridge Wells, Hastings, Ashford, Crawley, and Tonbridge & Malling Borough Councils; Defra; and organisations representing farming, forestry, community, business and recreation interests.

