

# Ofgem RIIO-ET2 Consultation

## Response obo the Landscape Institute

### RIIO ET2 Sector Specific Methodology

The Landscape Institute is a stakeholder and is represented on the Stakeholder Advisory Group for the Visual Impact Provision by Mary O'Connor FLI. We set out, first, a brief introduction to the Landscape Institute and, then, our response to the RIIO ET2 Sector Specific Methodology consultation questions ET46 – ET48.

### About the Landscape Institute

The Landscape Institute (LI) is the chartered body for the landscape profession. It is an educational charity that promotes the art and science of landscape practice.

Through the work of its members, **the LI's aim is to protect, conserve and enhance the natural and built environment for the public benefit.**

The LI provides a professional home for all landscape practitioners including landscape scientists, landscape planners, landscape architects, landscape managers and urban designers.

#### Supporting landscape practitioners

The landscape profession is as diverse and dynamic as the landscapes they work on. We support our members through advocacy programmes, events and numerous networking activities, many of which are organised through our branches across the UK.

Our professional development programme helps our members achieve the highest standards in landscape practice. **Chartered membership of the Landscape Institute (CMLI)** is only awarded to those who reach the high standards required in landscape education and practice. CMLI is a mark of excellence that prospective clients and employers can rely on.

#### Representing landscape professionals

We work with governments to ensure the voice of landscape professionals is heard on a range of policy issues.

We represent landscape professionals and want landscape to be at the top of the agenda when national and devolved governments are developing initiatives and strategies. We are the voice of the profession on topics such as infrastructure, housing, flooding, public health, sustainability, farming, and much more.

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### Promoting landscape practice

We champion the great work done by landscape practitioners through the press, broadcast and digital media along with our events and exhibitions.

Our case studies library is a collection of contemporary landscape projects ranging from global-scale projects like Olympic parks through to neighbourhood schemes.

One of the biggest events in the landscape industry is our annual awards, which celebrate the scale and scope of UK and international landscape practice.

### Protecting the natural and built environment

As an educational charity, we support current thinking and actions that promote the use of landscape for the benefit of the public. For instance, we welcome initiatives that promote public health, sustainability, and tackle climate change. We support landscape practice that creates thriving communities through the design and management of inspirational places. The skills of landscape practitioners, across environmental, planning, management and design, can enhance the quality of human life.

## Response to the RIIO ET2 Consultation

The LI welcomes Ofgem's proposal to include in the objectives of the RIIO framework to mitigate the impact of the transmission networks on the environment, including to retain the **mitigation of visual amenity effects** in designated areas in RIIO-ET2. The following are our responses to the Ofgem Consultation for RIIO-2 in relation to Electricity Transmission, specifically the landscape and visual amenity impacts of existing transmission infrastructure, as set out in Chapter 4 of the RIIO-ET2 documents, questions ETQ46 – ETQ48.

Question	Response
<b>ETQ46.</b>  (i) Do you have views on the retaining the existing scheme to mitigate the visual impact of pre-existing transmission infrastructure in designated areas?	The LI strongly supports the Visual Impact Provision (VIP) of the RIIO Framework. It is an innovative approach to resolving conflicts between existing transmission infrastructure and the landscape and visual amenity of landscapes, especially those statutorily designated for their scenic beauty and to support their enjoyment and understanding by the public. As noted in the RIIO-2 Sector Specific Methodology for electricity transmission (RIIO-ET2, para 4.86), Stakeholders with an interest in the landscape are concerned about detrimental impacts of existing transmission infrastructure on landscape character, and on visual amenity as a result. Such detrimental effects detract from the natural beauty and

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	<p>enjoyment of the public, and have consequential adverse effects on visitor experience, local tourism, and employment opportunities in local communities.</p> <p>Under RIIO-1 VIP, a process was established using widely accepted methods of assessment<sup>1</sup> to identify where the existing transmission infrastructure was causing adverse effects on landscape character and visual amenity<sup>2</sup>. This provided a ranked schedule of locations on the transmission network where action under VIP should be focussed. It quickly became apparent that the major engineering projects needed to replace overhead lines with underground cabling would require a lengthy programme to complete, from design, site investigations, consultations, environmental impact assessments, gaining planning approvals, to appointing contractors and completing the construction and landscape restoration processes. This would mean that the benefit of the VIP would not be experienced for a considerable number of years. And indeed, it has taken 5 years under RIIO-1 to get to the point of submitting projects to Ofgem for approval.</p> <p>In that context, the lower-cost mitigation scheme of landscape enhancement and screening projects was developed, known as the Landscape Enhancement Initiative (LEI). The interest of the designated landscape bodies in putting forward projects under this Initiative has supported the allocation of a small portion of the provision to these lower-key interventions.</p> <p>The LI believes that the LEI will result in the desired mitigation and will show fruit for the VIP within a reasonable timeframe and its continuation is more than justified as a necessary and complementary ingredient in the VIP mix.</p>
<b>ETQ46.</b>	<p>Yes. The response to the willingness to pay survey for RIIO-1 gave confidence in pursuing the VIP and LEI schemes. We believe it is a valuable exercise for both the public, in giving them a chance to express</p>

<sup>1</sup> Based upon Guidelines for Landscape & Visual Impact Assessment, Landscape Institute & Institute for Environmental & Management & Assessment, Routledge 2013

<sup>2</sup> Landscape & Visual Impact Assessment Technical Report: <https://www.nationalgridet.com/document/84141/download>, and related study documents

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(ii) Do you agree that any decision to implement new funding arrangements should be subject to updated analysis around willingness to pay?	their view, and for National Grid and the Stakeholders, to enable them to understand the extent to which bill-payers would be willing to accept the very small additional cost on their bills for the very great benefits that can be anticipated from the schemes.
<b>ETQ47.</b>  Do you agree with our proposals to modify the implementation process by which funding requests for mitigation projects are submitted and approved?	<p>The proposal to include major engineering mitigation projects in the TO's business plan would present challenges, as the Consultation document anticipates. Principal amongst these, is the environmental sensitivity of the areas where the projects would take place. This can mean that, after determining a particular project should be next on the prioritised list, more detailed investigation may reveal complicating factors, whether environmental, geo-physical or other. The result can be that a project may be delayed by pre-planning application considerations, although presenting as a worthy candidate for mitigation by major engineering measures. Projects could be outlined in the TO's business plan, but it must be recognised in whatever price control mechanisms are provided in the RIIO-2 that they may need to be changed. It is essential that flexibility is built in to the framework.</p> <p>The Landscape &amp; Visual Impact Assessment that underpins identification of the major projects also provides a valuable resource for the LEI projects, highlighting the aspects of the landscape that can be enhanced and where views can be ameliorated, to help achieve the objectives of the Initiative and VIP.</p> <p>In RIIO-1, the process for approving LEI projects was set out in the Policy approved by Ofgem. This involved checks by technical experts during the project formulation stages, to make sure they conformed to the landscape/ visual amenity objectives and the financial parameters of the Initiative scheme. Only when the technical experts agreed that the projects were compliant were they presented to the Approvals Panel. The Panel took an overview, based on the representation on the Panel of national level landscape (LI), natural and historic/cultural environment</p>

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	<p>bodies (Natural England, Natural Resources Wales, Historic England and Cadw).</p> <p>However, project proposals were subject to delays at the point of submission of projects, approved by LEI Approvals Panel, to Ofgem for their approval for funding. We understand that the relatively small scale of the LEI projects meant their position in the decision-making queue would be low. However, despite their low cost, these projects are an important part of the overall VIP scheme. The issue seems to have been that Ofgem felt it necessary to re-check the detail of the proposals.</p> <p>The delay in getting projects to implementation stage after a considerable effort by the proposers (the designated landscape bodies) has diminished their enthusiasm. We are concerned it could result in a reluctance to invest in making proposals that would undoubtedly be beneficial in mitigating some of the adverse effects of the overhead lines. We believe a more efficient and expeditious process is needed to ensure the success of the LEI and its contribution to the objectives of the VIP.</p> <p>National Grid are proposing a change in the process: once passed by the Approvals Panel, the projects would be submitted to a National Grid Investment Committee. They would produce an Output Table for Ofgem, quantifying the elements to be delivered by the projects (e.g. so many hectares of woodland or linear metres of stone walling). This would be submitted to Ofgem with the proposals package, enabling Ofgem to distinguish easily what it is they are being asked to approve. With this information, we envisage Ofgem could proceed straight to consultation, on the basis that National Grid and the LEI Approvals Panel had carried out the due diligence on the project proposals.</p> <p>The LEI Approvals process, as set out in the Policy already approved by Ofgem, could be subject to checking by Ofgem, similar to the way quality management systems are kept under review. Then if the process is accepted and properly followed, Ofgem would not have to check projects submitted to them at a detailed level.</p>

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<p><b>ETQ48.</b></p> <p>We welcome stakeholders' views on any other considerations they think are relevant to policy development for visual amenity issues in RIIO-ET2.</p>	<p>As recognised in the Consultation documents, the potential to extend the geographic application of the VIP/ LEI schemes could be reviewed. It may be worthwhile to set an objective for such a review to be carried out during RIIO-2. Already the potential for inclusion of World Heritage Sites and National Trail corridors has been reviewed and, as noted in the RIIO-ET2 Consultation documents, have been scoped out because the existing infrastructure coincides with designated landscapes within the existing scope of the VIP.</p> <p>The European Landscape Convention, of which the UK is a signatory, recognises that landscapes do not need to be designated to have value to people. "Ordinary, everyday landscapes" are also important, as the places where people live and work, which they enjoy for recreation, and which provide the setting for their lives. There may be potential to extend the scope of the VIP and LEI to landscapes of cultural or historic importance, or to extend to a greater buffer from the statutorily designated landscapes already within the scope of the VIP, up to, say, 10km or some other buffer justified by landscape and visual analysis.</p>

**Mary O'Connor FLI**

Representing the Landscape Institute on the VIP Stakeholder Advisory Group

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