



THE BROADS SOCIETY

www.broads-society.org.uk

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Ms. A. Monroe
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Dear Ms Monroe

Developing network monopoly price controls for the Electricity Supply Industry

It is generally accepted that Broadland forms the most important wetland complex in Lowland Britain. Occupying as it does the lower flood plains of the three largest rivers in East Anglia, the landscape of the region, as well as its ecology, is of very special interest, while its waterways form the venue for a multi-million pound tourist industry. The Broads Society, a voluntary body established in 1956 as a focus for those having a particular interest in the region, has a membership (currently of about 1700) reflecting the wide range of persons who live and work in the region, and who make use of its waterways for business, pleasure and tourism.

The Society was actively involved in the discussions which took place during the 1970s concerning the need to afford the region a status commensurate with its national scenic and ecological importance, and we welcomed the creation of the first Broads Authority in 1978. Subsequent experience indicated that the organisation responsible for planning and managing the region needed to be armed with additional statutory powers, notably in relation to navigation, and we now work closely with the present Authority, set up under the provisions of the Norfolk & Suffolk Broads Act, 1989.

We note from the first paragraph of your 89 page Consultation Document that OFGEM's statutory responsibility is....."to protect the interests of consumers by providing effective competition". However, we are apprehensive lest this objective is achieved at the expense of the environment, and in particular the landscape of areas such as Broadland. In this connection, we were concerned to note how few references there are in the Document to environmental matters; indeed, these are not mentioned at all in those sections which identify 'Issues for Consideration' by consultees - eg paras. 4.20, 5.15 and 7.14. In view of this, we thought it might be helpful if we set out in our response to the Document how the infrastructure of the



Distribution Network Operators (DNOs) impinges on Broadland's visual amenity, the extent of the problem, and the steps being taken to mitigate this.

The largest formation within the Broads Authority's Executive Area is the c. 20,000 ha Drained Marshland Area (DMA), one of the largest areas of predominantly grass marsh left in Britain. Much of the DMA lies below the level of mean high tides, and consequently has to be drained by a multitude of electrically-powered pumps. Because of the openness of the landscape, the 11 kV overhead power lines supplying these are very intrusive visually. They also form a hazard for the swans, geese and other birds which frequent the DMA, much of which has been designated as a Special Protection Area under the Government's 'Birds Directive'. In the light of these circumstances, and the fact that the company responsible for these power lines, namely EPN Distribution, has set aside funds for diverting or undergrounding carefully selected examples, the Broads Authority invited our Society last Autumn to carry out three tasks: to map the 11 kV power lines within the Authority's Executive Area, to make recommendations as to what level of priority should be ascribed to each, and to identify for the Authority's consideration a short list of five overhead lines which, in the Society's view, should be afforded top priority for undergrounding.

Briefly summarised, we found that no fewer than 54 of EPN's 11 kV overhead power lines cross the Executive Area, their combined length being about 44.5 km. We took the view that 33 of these lines, extending to a total length of about 32 km should, given their very adverse affect on the region's landscape, be undergrounded as soon as possible. Using the figures quoted in the report entitled 'A Clear View - Reducing the impact of Overhead Wires' (Friends of the Lake District, 2003) it would appear that the cost of doing this would lie somewhere between £1M and £2.6 M. The five lines (out of the 33) which we recommended in our report should be given top priority have a combined length of 7.6 km, and would therefore cost between £228 k and £608 k to place underground. We felt that given the national scenic importance of the Broads region, the eventual aim should be to deal with all the remaining 21 lines, but that action on these could be deferred for the time being.

I should perhaps add that the region's waterways are crossed in two places by power cables owned and operated by the National Grid Company. In both cases, the pylons carrying these are extra tall to allow tall-masted vessels (and in the past, sea-going vessels) to pass underneath. As a consequence, they are visible for many miles around. Although we would certainly like to see these cables placed underground, we are well aware that the cost of achieving this would be very high, given that they would have to be trenched under navigable waterways.

We understand that discussions are currently on-going between the Broads Authority and EPN Distribution with a view to deciding whether moneys from the latter's Amenity Fund could be made available for undergrounding the five 11 kV lines afforded top priority for undergrounding in our report. However, the Authority's budget is already under heavy pressure, and it is a moot point whether



the necessary match-funding can be found at the present juncture.

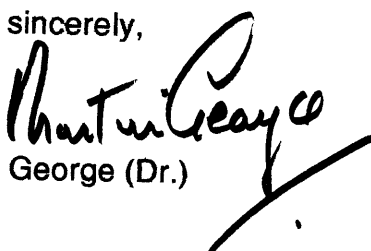
The challenge for OFGEM, as we see it, is for it to fulfil its statutory function of protecting the electricity consumers' interests without at the same time diminishing the DNOs' ability to set aside funds for environmentally-desirable works. More specifically, the greater the pressure that OFGEM exerts on EPN Distribution to increase the efficiency of its operations, the less likely it will be that the company will be in a position to respond positively to the pleas being made by bodies such as this Society and the Broads Authority for it to allocate funds for undergrounding the power lines crossing the latter's Executive Area. In this respect, it is relevant to point out that Section 97 of the Countryside and Rights of Way Act 2000 had the effect of inserting a new clause (numbered 17 A) into the Broads Act. This means, in effect, that EPN Distribution, the National Grid Company, and indeed OFGEM itself, are, in common with other public bodies, obliged....." when exercising or performing their functions in relation to, or so as to affect land in the Broads, to have regard to the purposes set out in the Broads Act". We were concerned not to find any reference to this obligation in your Consultation Document.

We note with interest that it is proposed to make an assessment of the willingness or otherwise of consumers to pay for environmentally desirable works such as realigning or undergrounding power lines. It seems to us that such a review is long overdue. However, its terms of reference need to be very carefully thought out. For instance, those living in an urban environment are likely to have rather different views about undergrounding such lines, than persons living in the countryside. By the same token, those resident in a national park or area of outstanding beauty are likely to have stronger and better defined views on this issue than those living in the wider countryside where overhead power lines will often tend to be regarded as something of a 'non-issue'. In the circumstances, we believe that those living in the Broads or one of the national parks could well prove to be less averse to some form of environmental levy on their electricity bills than the average consumer.

Finally, there seems to us to be a need for DNOs to agree a phased programme of environmentally-desirable works with national park authorities (including the Broads Authority), rather than continue with the present, somewhat *ad hoc* arrangements. We would hope that OFGEM will include a reference in the forthcoming review to the need for each DNO to engage in a dialogue with the relevant environmental agencies aimed at developing such a strategy.

I hope that the above comments prove useful, and that you will take our views into account when carrying out the forthcoming Review.

Yours sincerely,


Martin George (Dr.)

