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Llywydd/President Brian Blessed
Cyfarwyddwr/Director Kathy Moore

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By email and first class post

Dear Cemil Altin

ELECTRICITY DISTRIBUTION PRICE CONTROL REVIEW – INITIAL PROPOSALS

The Council for National Parks (CNP) welcomes the opportunity to respond to the initial proposals. CNP is the national charity which works to protect and enhance the National Parks of England and Wales and areas that merit National Park status and promote understanding and quiet enjoyment of them for the benefit of all.

CNP is very disappointed that the Initial Proposals do not include any proposed action by Ofgem to address the issue of overhead wires on the landscape or specifically any information on how Ofgem intends to meet its statutory duty under Section 62 of the 1995 Environment Act to have regard to National Park purposes. In our view Ofgem has missed an important opportunity to enable the limited funding of priority undergrounding schemes in National Parks and in so doing appears to have paid little regard to its statutory responsibilities under the Environment Act. We consider that Ofgem has the responsibility to ask/set more undergrounding which the Initial Proposals do not take forward or address.

CNP notes that the Third Reading of the Energy Bill introduced a new duty on Ofgem in relation to its contribution to the achievement of sustainable development. We further note that the recent publication of the House of Lords Science and Technology Committee report on the Practicalities of Renewable Energy warned that the duties of the regulator Ofgem were “too short-termist”.

CNP is concerned that the Initial Proposals fail to refer adequately to the detrimental impact of overhead wires on the landscape. We are also worried that the consumer survey has been used to justify taking no further action to improve levels of undergrounding when we would not interpret it in this way.

Ofgem’s proposed approach to this issue would also seem to undermine the positive responses from companies about allowances for amenity undergrounding.

In light of the above we would urge a rethink on this important matter which we look forward to discussing with you on 2nd September at the meeting which has been set up by the Friends of the Lake District.

Please do not hesitate to contact me should you require clarification of any of the above.

Yours sincerely

Ruth Chambers
Deputy Chief Executive

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