

## FRIENDS OF THE LAKE DISTRICT

Andrew MacFaul,  
Head of Better Regulation and Co-ordination,  
OFGEM,  
9 Millbank,  
London  
SW1P 3GE

19 January 2006

Dear Mr MacFaul,

### **Corporate Strategy and Plan 2006 - 2011**

Friends of the Lake District are a landscape charity and company limited by guarantee. We have approximately 7000 members, represent the CPRE in Cumbria and are members of the Council for National Parks. Issues relating to the electricity industry have featured throughout our organisations' history. Recently our work has concentrated on reducing the visual impact of electricity apparatus, including overhead wires on the landscape. In 2002 we published a research document exploring 'The Scope for Undergrounding Overhead Electricity Lines' and have since been active in implementing many of the recommendations that came from the report. This has included engaging with Ofgem during the Distribution Price Control Review (DPCR4) and we are pleased with the new arrangements introduced with regard to undergrounding electricity cables in National Parks and Areas of Outstanding Natural Beauty.

FLD welcomes Ofgem's continued commitment towards consultation, not only with those directly involved in the industry, but also with all interested parties. As an organisation concerned about our environment we are very pleased to note that one of the themes of the strategy is 'Helping protect the environment'. We are also pleased to note that Ofgem acknowledges the statutory duties it has to contribute to the achievement of sustainable development and in relation to the purposes of National Parks and AONBs (section 62 of the Environment Act 1995, and section 85 of the Countryside and Rights of Way Act 2000).

#### **Question 2 : Have we identified all the relevant issues within themes?**

2.14 We note that OFGEM will continue to develop indicators and incentives for quality of service. We consider that quality of service should include landscape and environmental issues, e.g. quality of service to designated landscapes. We are happy to work with OFGEM to develop indicators relating to the impacts of the electricity system on the landscape.

3.14 Network investment : We would like to see mention of two additional issues in this paragraph. First, a policy of removing old or outdated equipment when there is new investment in equipment or systems. Secondly, a policy that when developing new equipment and technology, regard will also be had to trying to develop technology and systems which are not only the cheapest, but are also the most environmentally and landscape friendly, even if the net cost is higher. Investment should therefore focus on forms considered to have a lower visual impact on the landscape, e.g. underground cables, low visual impact substations and transformers, etc.

## Theme 5 : Helping to protect the environment

As noted above, FLD are delighted to see recognition by OFGEM of its statutory duties to sustainable development and to designated landscapes, and we are working hard with DNOs to take up the allowance for undergrounding wires in these areas.

Para 5.4 : We note the framework which has been established to ensure policies which have a significant environmental dimension are consistent with statutory objectives and duties. However, we would question why this applies only to those policies which have a significant environmental dimension, and not to all policies?

We welcome OFGEM's commitment to looking at policy which could have an impact on the environment. We hope this will include consideration of landscape and amenity issues as well.

Para 5.5 : We note the role of OFGEM in advising Government and EU on approaches to meeting environmental targets which have the lowest overall costs for consumers – we hope that that will not be limited purely to financial costs, and that costs on the environment and sustainable development issues will also be factored in.

Para 5.8 : We welcome the reference to the impact of the network on visual amenity. As noted above, we are working hard with partners locally and nationally to ensure we maximise opportunities and use of the allowance for undergrounding. We are delighted with the levels of support for this allowance from both DNOs, the public and other partners.

In terms of the deliverables for 2006 – 2007 for the environment theme listed in Appendix 3, we note there are no deliverables relating to landscape, visual or amenity issues. We are happy to provide a list of possible indicators for this period or future periods if that would be helpful, e.g. lengths of overhead wires in National Parks and AONBs placed underground; list of actions which help achieve the statutory duty to National Parks and AONBs, etc. Please do not hesitate to ask us if you would like to consider this offer further.

We hope that our comments will be helpful. Please do not hesitate to contact us if you should require clarification on any of the above issues, for any further information.

Yours sincerely



Jan Darrall  
Policy Officer

**Friends of the Lake District**