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By e-mail to [andrew.macfaul@ofgem.gov.uk](mailto:andrew.macfaul@ofgem.gov.uk)

18 September 2007

Dear Mr MacFaul,

## Corporate Strategy and Plan 2008 - 2013

As you will know Friends of the Lake District are a landscape charity covering the whole of Cumbria. 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 overhead lines on the landscape.

We believe that the challenges facing the electricity industry in the short to medium term include the following.

1. Ofgem has a statutory duty to have regard to sustainable development and we believe it should take positive action to meet this duty.

The industry, both transmission and distribution, should be given incentives to take more account of sustainable development rather than simply focussing on financial costs and indicators that are related to monetary objectives such as economic efficiency and maximising profits. Such objectives should be balanced against sustainable development criteria including visual amenity, landscape character, carbon emissions and reducing electricity losses.

Levels of customer service and minimising disruptions to the power supply through greater resilience are important however many consumers do have other concerns. A focus on economic efficiency alone can be to the detriment of landscape protection, which may affect both individual enjoyment and businesses that depend on high quality environments. To support sustainable development electricity distribution and transmission networks should not simply be maintained as they currently exist but steps should be taken to enable lines to be placed underground to improve and enhance areas of outstanding landscape value.

2. We have responded to the 'DPCR5 – Looking ahead: an initial consultation' specifically to make some observations with regard to the allowance for undergrounding of overhead lines in National Parks and Areas of Outstanding Natural Beauty (AONBs). We would simply reiterate that we believe because of

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the long lead in times involved in projects of this nature that both the scheme's continued existence into DPCR5 and the funding of any DPCR4-initiated work that completes in DPCR5 should be agreed in principle prior to the commencement of DPCR5 discussions. In this way there would be no loss in momentum for partnership working that has taken some time to establish and we can avoid the likelihood that new work would cease in 2008. In addition we also believe that the criteria and guidelines under which the scheme currently operates should be reviewed.

3. Pylons associated with the transmission network have detrimental effects on both landscape character and visual amenity. There is wide agreement that electricity pylons striding across valued landscapes destroy qualities such as views, far horizons, openness, space and remoteness. Thus the transmission companies must be enabled and positively encouraged to take decisions on routing and use of new technologies such as XPLE cables that both protect and enhance these qualities particularly in our designated landscapes, that is National Parks and AONBs. We believe that new lines should be routinely placed underground in areas of outstanding landscape value. In addition provision should be made to enable existing pylon networks to be placed underground in such areas.

Connecting power generated from renewable sources into the National Grid is clearly going to be a major challenge facing, in particular, the transmission industry, as shown by the enquiry to connect wind energy generated in the Isle of Lewis via a line running through the Cairngorms National Park. We believe for offshore generated power the alternative of a transmission network based on sub sea cables down the east and west coasts of the United Kingdom should be regarded as the preferred option. In addition though not within the remit of Ofgem we also believe that the planning process for schemes that include generation, transmission and distribution over large distances should be considered as one.

FLD hopes that the above response is helpful. Please do not hesitate to contact me should you require clarification of any of the above or any further information.

Yours sincerely

*Penny Ozanne*

Penny Ozanne  
Project Officer – Overhead Wires  
Friends of the Lake District

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