



Dorset AONB Partnership
AONB Office
The Barracks
Bridport Road
Dorchester DT1 1RN
Tel: 01305 756782
Fax: 01305 756780
dorsetaonb@dorsetcc.gov.uk
www.dorsetaonb.org.uk

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Ms Rachel Fletcher
Director, Distribution
Office of Gas and Electricity Markets
9 Millbank
London SW1P 3GE

Sent by email to DPCR5.reply@ofgem.gov.uk

Dear Ms Fletcher

**Re. Electricity Distribution Price Control Review Policy Paper Consultation (DPCR5)
Undergrounding in AONBs and National Parks**

The Dorset Area of Outstanding Natural Beauty (AONB) Partnership welcomes the opportunity to comment on the Electricity Distribution Price Control Review Policy Paper consultation document.

The Dorset AONB Partnership co-ordinates the management and protection of the Dorset Area of Outstanding Natural Beauty, which was designated in 1959 to conserve and enhance its natural beauty. The DPCR5 consultation has been considered by the Dorset AONB Partnership Board, which includes elected representatives from Dorset County Council, West Dorset District Council, Purbeck District Council, North Dorset District Council and Weymouth & Portland Borough Council, plus nominated representatives from Natural England, other statutory and regional agencies, the National Trust and National Farmers Union.

Our comments focus on proposals regarding undergrounding in AONBs and National Parks. The Dorset AONB Partnership strongly welcomed the introduction of the undergrounding allowance through DPCR4 and a number of schemes are underway in this AONB through Southern Electric Power Distribution. There has been wide stakeholder support locally for these schemes, which represent a **real and tangible enhancement to the landscape** and a proactive demonstration of the industry's commitment to fulfilling its duties under the Countryside and Rights of Way Act 2000. We therefore **strongly support** the proposed retention of the allowance in DPCR5 to enable further schemes to be undertaken.

One disappointment for us with the initial introduction of the scheme was the lack of participation by Western Power, which covers the western side of the AONB. This left us with an inconsistent approach across the area and meant that a number of other AONBs did not benefit from the scheme at all. While we appreciate the point that buy-in is important, we feel that it is more important to have a consistent approach for all AONBs and National Parks and therefore consider that the scheme should be **mandatory**.

Regarding funding of the schemes, we welcome the proposed increase on the caps and also note the suggestion that voltage caps could be removed in favour of an overall cap. We wonder whether a more **flexible approach** could be considered which uses the voltage gaps as a guide on value for money but allows for exceptions to be made. If for example an AONB Partnership or National Park Authority identify a scheme as of the highest priority in landscape terms, it may justify exceeding the guide cap. There should be some discretion to allow for this. We would also note that while DNOs should be encouraged to match fund schemes from other sources, in our experience EU and HLF funds are unlikely to contribute to what they will tend to see as statutory work.

The issue of **new overhead lines** in AONBs and National Parks is an important one that requires careful consideration. The removal of existing lines contributes significantly to the enhancement of these areas, but the statutory duty is to conserve and enhance natural beauty. Preventing new intrusive overhead lines going in would be a major contribution to conserving natural beauty and it would be ridiculous to put something in that would cost money to have removed later. While planning and environmental legislation can in theory prevent intrusive lines being installed and more innovative solutions could be developed, in our experience this is not a reliable solution in itself. While local planning authorities are consulted they are generally not the decision makers and have no ability to enforce their views. We would like to see a new policy introduced to tackle this issue, ensuring that new lines that would degrade protected landscapes are either put underground or alternative solutions found.

We note your concerns expressed in the consultation document about allowing inclusion of schemes that overlap the **visual boundary** of an AONB / National Park, however we disagree with your conclusion. The Dorset AONB Management Plan recognises the importance of views into and out of the AONB as well as those within it. It is established that developments outside the boundary can impact on the natural beauty of the AONB and power lines straddling or close to the boundary could be highly intrusive and degrading. We consider that these should be included within the scope of the scheme and suggest that the AONB Partnership or National Park Authority should take the lead in advising on their level of priority from a landscape perspective.

Finally, we would like to reiterate our overwhelming support for the undergrounding initiative and Ofgem's contribution to the conservation and enhancement of our finest landscapes. We hope the above comments will be helpful in maximising the benefits of this scheme for the future.

Yours sincerely



Sarah Bentley
Dorset AONB Team Manager