

12 February 2009

DPCR5 Response
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Dear OFGEM,

Friends of the Peak District is a registered charity, originally established in 1924, working to safeguard the unique landscapes of the Peak District for future generations. It is managed by the Peak District & South Yorkshire Branch of the Campaign to Protect Rural England (CPRE) and is a member of the Campaign for National Parks (CNP).

We strongly welcome the commitment to continue the undergrounding schemes in AONBs and national parks. In relation to extending the scheme to other designated areas, we remain supportive as long as funding levels are not reduced for nationally designated landscapes. This should not happen if a *pro rata* approach is taken, i.e. allocating a sum to cover a fixed proportion of the overhead network be undergrounded.

In respect on the possible new caps (uplifted), we believe that they would still be insufficient and thus form a significant barrier to progressing action on parts of the network that cause the most visual disamenity in highly sensitive landscapes. We understand why cost caps form a central part of OFGEM's thinking but would ask for a more nuanced approach that also places value on the increase in visual amenity achieved. Currently the scheme can be perverse – less intrusive portions of the network have been undergrounded because they fit the per km cap but worse lines remain. More flexibility is required to spend the overall sum to maximize the amenity gain. This also represents strong value for money in terms of amenity improvement per £/km.

We are also keen to see the scheme applied in part to help underground potentially intrusive new wires by offering to fund the difference between the cost of overhead provision and undergrounding. Given that OFGEM are now happy to allow additional undergrounding related to ongoing asset replacement works, this seems a natural progression. We would also hope that OFGEM will take a sensitive approach to the identification of lines close to the boundary of designated areas where they seriously affect the setting of the protected landscape, seen either from inside or outside the boundary.

Finally we are disappointed to note that there will not be a carryover of DPCR4 funds for work begun at the end of that period but completed in DPCR5. We hope OFGEM will reconsider this vital issue.

Yours sincerely

(Dr) Andy Tickle
Head of Planning and Campaigning

President: : Julia Bradbury

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