



11 September 2009

DPCR5 response  
Electricity Distribution  
Ofgem  
2<sup>nd</sup> floor, 9 Millbank  
London SW1 3GE

By e-mail to: [DPCR5.reply@ofgem.gov.uk](mailto:DPCR5.reply@ofgem.gov.uk)

Dear Ofgem,

**Electricity Distribution Price Control Review Initial Proposals paper, ref.92/09 & 93/09**

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 welcome the continued commitment to retain the allowance as signalled previously and are particularly pleased at the proposal to remove the voltage caps, which have been a significant barrier to removing a large proportion of lines that have been prioritized on account of their intrusiveness. This now means that the overall aim of the scheme can be properly realized – removing lines that have the worst effect on visual amenity in designated landscapes, rather than those that are least costly to underground.

The demonstration of wide stakeholder support is a useful test for more ambitious schemes. The corollary of this is that strong demand for undergrounding by key stakeholders should mean that DNOs should demonstrate their commitment to improving visual amenity by:

- full participation in the scheme: committing to undergrounding of both village LV networks and open countryside HV lines;
- working consensually with key stakeholders in an effective and efficient way so as to maximize use of the allowances. This should involve nominated staff

within the DNO taking on clear and specified roles to help deliver the scheme's intended outcomes;

- convening regular stakeholder meetings to help bring forward, prioritise and progress schemes and promote best practice within the DNO area.

Finally we ask that the decision not to include lines affecting the setting of national parks and AONBs to be reconsidered. Current planning law and local policies makes both statutory undertakers (including DNOs) and local planning authorities (LPAs) have regard to impacts on national parks when considering development close to the boundary. Extending the scheme to analogous existing development would not be unnecessarily complicated or confusing and would bring considerable benefits in key locations.

We hope careful consideration will be given to our views and look forward to some further improvements to the scheme in the Final Proposals.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Andy Tickle', is written over a horizontal line. The signature is cursive and somewhat stylized.

**Dr Andy Tickle**  
**Head of Planning and Campaigning**