

Dear Rachel,

The Norfolk Coast Partnership look after the Norfolk Coast Area of Outstanding Natural Beauty and we are members of the steering group covering the EDF Energy Networks EPN and SPN areas, responsible for prioritising the delivery of the undergrounding of overhead wires in protected landscapes in DPCR4.

We thank you for the opportunity to comment on your consultation and we would like to record our grateful appreciation for the efforts made by OFGEM and the network operators (particularly EDF Energy Networks) which have meant that the current scheme has been hugely successful.

We have restricted our comments to the proposals set out in Chapter 9 of consultation paper 93/09.

Paragraph 9.1 – We welcome the retention of the allowance for network undergrounding in National Parks and Areas of Outstanding Natural Beauty (AONBs) for the duration of DPCR5.

Paragraph 9.4 – We welcome the proposal to remove the voltage caps as this will allow much greater flexibility in trying to ensure that those projects which have the greatest landscape benefit can be delivered.

Paragraph 9.5 – We recognise that we have benefited as a result of EDF Energy's support for the scheme and can see that this approach has a potentially wide application. We are therefore disappointed that OFGEM has not seen fit to ensure greater application of the scheme by making it mandatory.

Paragraph 9.7 – We have seen the huge benefit that is gained by the employment of a dedicated project officer and this has been crucial to the delivery of the many schemes that have taken place in EDF Energy's EPN and SPN regions. We are therefore disappointed that OFGEM has not agreed to the direct funding of such posts through DPCR5.

Paragraph 9.8 – We welcome use of the allowance to cover the cost difference between a normal replacement solution and a new underground solution where the replacement is driven by visual amenity benefits.

Paragraph 9.9 - We are disappointed that OFGEM remains of the view that newly built lines in National Parks and AONBs should continue to fall outside the scheme. Whilst it is accepted that there are other mechanisms available to encourage undergrounding of new lines, the reality is that the extra costs of these would fall either on private landowners or local planning authorities. However, the benefits are shared by a much wider community.

Paragraph 9.10 – We are disappointed that OFGEM will not allow the inclusion of overhead lines that are outside protected landscapes. A key aspect of the consideration of all proposed developments that may affect an AONB is the need to have regard to its setting. This is accepted by the Planning Inspectorate as a relevant issue which does not cause the confusions which seem to underpin OFGEM's decision to make the statutory boundary of an AONB/NP a hard and fast line, as far as the scheme is concerned. This is particularly confusing as National Grid has already recognised the importance of the setting of AONBs and National Parks when siting new transmission lines. We believe most, if not all stakeholders, would accept the need for some flexibility in the scheme to take account of the setting of a protected landscape, particularly if the work outside the AONB or NP is a continuation of work within the AONB or NP. We would ask you to reconsider this proposal and accept some flexibility where the local consultation process considers the work to be relevant to the purposes of the designation of the protected landscape.

Paragraph 9.12 – We welcome the decision to change the definition of the point of completion of undergrounding work and thus the ability to carry over an element of the DPCR4 allowance.

Yours sincerely,

**Estelle Hook**

Policy & Partnership Officer

**Norfolk Coast Partnership**

The Old Courthouse

Baron's Close, Fakenham  
Norfolk NR21 8BE

**Estelle Hook**

Policy & Partnership Officer

**Norfolk Coast Partnership**

The Old Courthouse  
Baron's Close, Fakenham  
Norfolk NR21 8BE

Telephone: 01328 850530

Fax: 01328 850546

Email: [estelle.hook@norfolk.gov.uk](mailto:estelle.hook@norfolk.gov.uk)

Web: [www.norfolkcoastaonb.org.uk](http://www.norfolkcoastaonb.org.uk)

**Protecting an Area of Outstanding Natural Beauty**

*Funded by Natural England, Norfolk County Council, North Norfolk District Council, Borough Council of King's Lynn & West Norfolk and Great Yarmouth Borough Council*