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## **Suffolk Coast and Heaths Area of Outstanding Natural Beauty**

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Neil Lister  
Projects Officer  
Suffolk Coast and Heaths Unit

Rachel Fletcher  
Director, Distribution  
Ofgem

9<sup>th</sup> September 2009

Your Ref: 93/09  
Our Ref: CNS OFGEM DPCR5

Dear Rachel

**Electricity Distribution Price Control Review Initial Proposals, Incentives and Obligations – Consultation Response from the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Partnership**

The AONB Unit has examined the document and wishes to make the comments below in response. We have restricted our comments to the proposals set out in Chapter 9 of consultation paper 93/09 as these are of most concern and relevance to us.

The AONB Partnership is a body that represents the interests of all who live in and enjoy the AONB. It is made up of representatives nominated by the organisations listed in Appendix 1.

Before commenting on the consultation paper, we would like to record our appreciation and thanks to officers of Ofgem who have worked with us and our regional steering group as well as the distribution network operators to make the current scheme such a success. The Suffolk Coast and Heaths Partnership is grateful for the funding that has been made available for undergrounding overhead lines in protected landscapes through DPCR4 and welcomes the commitment to retaining this in DPCR5.

**Retention of the allowance**

The Partnership warmly welcomes the retention of the allowance for network undergrounding in National Parks and Areas of Outstanding Natural Beauty (AONBs). We believe the model, which has been a success in AONBs and National Parks does have relevance outside these areas and when economic circumstances improve we ask Ofgem to extend the scheme to those important landscapes that lie immediately outside AONBs and add greatly to the setting of AONBs and landscape quality.

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### **Voltage caps**

We welcome the proposal to remove the voltage caps.

### **Preventing new overhead lines**

We are disappointed that Ofgem remains of the view that newly built lines in Areas of Outstanding Natural Beauty (AONBs) and National Parks 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 will fall either on the private landowner or the local planning authority. The benefits are shared by a much wider community and in the absence of Exchequer funding for the marginal costs, it seems reasonable that the population as a whole should make a contribution through the electricity pricing mechanism.

### **Boundary issues**

An important aspect of the Planning System that affects AONBs is to have regard to their setting. This is accepted by the Planning Inspectorate as a relevant issue which avoids the confusions which could result following Ofgem's decision to make the statutory boundary of the AONB/NP a hard and fast line, as far as the scheme is concerned. We believe most, if not all stakeholders, would accept the need for flexibility in the scheme to take account of setting, especially if the work outside the AONB is a continuation of work within the AONB. We would ask you to reconsider the proposal as set out in 93/09 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

### **Interaction with DPCR4 scheme**

**Question 2: Do you agree with our proposed approach to undergrounding projects not completed by the end of DPCR4?** The decision to change the definition of the point of completion of undergrounding schemes, providing the ability to carry over an element of the DPCR4 allowance is welcome.

Finally I would like to reiterate the overwhelming support of the Suffolk Coast and Heaths AONB Partnership for the scheme and Ofgem's role in promoting it. If there are any points you would like expanded or clarified, please do not hesitate to contact me.

I ask that our comments are taken account of in the consultation exercise and look forward to hearing more about DPCR5 in the near future.

Yours sincerely

**Neil Lister**

Projects Officer  
Suffolk Coast and Heaths AONB Unit  
(on behalf of the Suffolk Coast and Heaths Partnership)

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## Appendix 1

### List of Organisations providing Nominees to the Suffolk Coast and Heaths Partnership

- Suffolk and Essex County Councils
- Babergh, Tendring, Suffolk Coastal and Waveney District Councils
- Ipswich Borough Council
- Country Land and Business Association
- East of England Development Agency
- East of England Tourism
- English Heritage
- Environment Agency
- Forestry Commission
- Haven Gateway Partnership
- National Farmers' Union
- Natural England
- Royal Society for the Protection of Birds
- Suffolk ACRE
- Suffolk Association of Local Councils
- Suffolk Coastal Business Forum
- Suffolk Farming and Wildlife Advisory Group
- Suffolk Preservation Society
- Suffolk Tourism Partnership
- Suffolk Wildlife Trust
- The Crown Estate
- The National Trust

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