



The National Association for AONBs
Cymdeithas Genedlaethol AoHNE

DPCR5 Response
Electricity Distribution
Office of Gas & Electricity Markets
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02 September 2009

**Electricity Distribution Price Control Review Initial Proposals Paper
Ref: 92/09 & 93/09**

Thank you for giving the National Association for AONBs an opportunity to comment on your initial proposals for the EDPCR. 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 our members.

The membership of the Association includes all the Joint Advisory Committees and Joint Committees and the two Conservation Boards with responsibilities for AONBs, most local authorities with AONBs in their areas and a number of other national and local organisations concerned for the future of these internationally important landscapes. Our primary aim is to raise awareness of the importance of AONBs both as national and internationally recognised protected areas so as to protect their outstanding landscapes for future generations.

Before commenting on the specific sections of the consultation paper, we would like to record our appreciation and thanks to officers of Ofgem who have worked with us and our members as well as the distribution network operators to make the current scheme such a success.

Retention of the allowance

The Association 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 the AONBs and NPs does have relevance outside these areas and hopefully as economic circumstances improve Ofgem will feel able to extend the scheme to other important landscapes at a later date.

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Voltage caps

We welcome the proposal to remove the voltage caps

Voluntary nature of the scheme

Whilst we support the voluntary nature of the scheme, which has undoubtedly been a contributory factor to its acceptance by most DNOs from the start, we hope Ofgem will continue to encourage all the DNOs to make a valuable contribution to the enhancement of some of our most important landscapes. The voluntary approach has been successful in improving the working relationship between the AONB partnerships, Local Planning Authorities and the DNOs at an operational level.

Preventing new overhead lines

We are disappointed that Ofgem remains of the view that newly built lines in National Parks and Areas of Outstanding Natural Beauty (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 will fall either on the private landowner or the local planning authority. However 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 all planning that affects AONBs is to have regard to their setting. This is accepted by the Planning Inspectorate as a relevant issue which does not cause the confusions which seem to underpin your 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 some 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

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 is welcome. We are aware of some difficulties even your new proposals might create, regarding the realities of project management, which have been highlighted by Friends of the Lake District, who are members of the Association and would ask you to take their comments into account when making your final judgement.

Finally I would like to reiterate the overwhelming support from the AONB partnerships for the scheme and Ofgem's role in promoting it. If there are any specific points you would like us to expand or clarify, please do not hesitate to contact me.

Mike Taylor
National Assoc. for AONBs

