

Office of Gas & Electricity Markets

9 Millbank

London

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21st January 2010

Dear Ms Fletcher

**Arnside and Silverdale Area of Outstanding Natural Beauty response to the consultation regarding the Ofgem Annual stakeholder report on electricity distribution**

The current Ofgem consultation on its customer annual report has been drawn to my attention by the Friends of the Lake District (FLD) with whom we have a close relationship on conservation issues and landscape protection, and with whom we have worked on the undergrounding of electricity cables in protected landscapes.

Whilst we believe it is very desirable for Ofgem to produce a more customer friendly annual report on electricity distribution, we can only reinforce the view expressed by FLD that the report should give information in relation to the allowance for undergrounding the network in National Parks and Areas of Outstanding Natural Beauty (AONBs). Taken as a whole Protected Landscapes account for around 30% of the land area of the UK and therefore the extent to which the undergrounding allowance affects electricity customers is significant. Also our protected landscapes are valued by those who visit them as well as those resident within them, and clearly there is widespread interest in any measures that deliver Landscape scale improvements within AONBs and National Parks.

The Arnside and Silverdale AONB is in fact one of the smallest AONBs in the UK, but has a very high biodiversity and is the stronghold for a number of nationally and even internationally rare species. Correspondingly, whilst the principal benefits of undergrounding are improvements to the landscape and scenery of the Area, we have seen biodiversity benefits from the work undertaken here in burying cable routes. The cables removed in Silverdale have removed a considerable obstacle to birds flying into Leighton Moss RSPB Reserve. Previously the cables had been festooned with bird markers, which had of course also increased the visual intrusion. Therefore this scheme has been especially valuable.

The most recent quality of service report annual report (Ref: 162 / 09) provided information on expenditure and kilometres removed by DNO over 4 years (Table 7). I am sure that a customer (who was asked in the survey work "What do you think about putting overhead lines underground in national parks and areas of outstanding natural beauty" would hope to see comparative information provided on each National Park and AONB within each DNO

area i.e. expenditure and lengths placed underground compared to allowance available and total length of line in each designated area.

In addition such information provided in a non-technical annual report would provide a useful comparative tool for AONB partnerships to measure their performance in relation to each other, to report to their Joint Advisory Committees. Such information would also provide a transparent measure of how DNOs are delivering AONB Management Plan objectives (these plans are statutory documents) and showing "due regard" to the designation of AONB.

I hope you find these comments useful and Ofgem is able to provide information as described above in an annual stakeholder report.

Yours sincerely

David Askew  
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Arnsdale and Silverdale AONB