

**The Chilterns
Conservation Board**
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Chairman: Sir John Johnson
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Chief Officer: Steve Rodrick

22nd January 2010

Rachel Fletcher
Director – Distribution
Office of Gas & Electricity Markets
9 Millbank
London
SW1 3GE

My Ref.: Planning/Wirescapes/CCB response re OFGEM annual report 220110

By E-mail only – rachel.fletcher@ofgem.gov.uk

Dear Ms Fletcher,

Annual stakeholder report on electricity distribution

You may know that a Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CROW) Act 2000.

Section 87 of the CROW Act sets out the purposes of a conservation board as:

- a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and
- b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty

But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).

Furthermore “A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty.”

Section 85 of the CROW Act states under “General duty of public bodies etc”

“(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.”

The Chilterns Conservation Board was established in 2005, with the purposes of conserving and enhancing the natural beauty of the Chilterns Area of Outstanding Natural Beauty (AONB). We are members of the National Association for AONBs.

The Board warmly welcomes OFGEM's decision to produce a more customer friendly annual report on electricity distribution and we welcome the opportunity to comment on its content. The Board only wishes to respond in relation to the allowance for undergrounding the network in National Parks and AONBs.

The Board has made comments about various aspects of OFGEM's work in connection with the undergrounding allowance. During these discussions it has been emphasised that a key reason why it has been agreed is that customers are willing to pay. This has been demonstrated in the survey work carried out by OFGEM and has been endorsed by stakeholders. In this case the endorsement has come from mainly environmental organisations with an interest in landscape conservation and enhancement. It seems rather strange to the Board that a measure to monitor progress is not included in the annual stakeholder report, which is likely to be the only report that both customers and such stakeholders refer to.

We understand that the most recent quality of service annual report provided information on expenditure and kilometres removed by DNO over 4 years. We are sure that a customer, if asked '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.

In addition such information provided in a non-technical annual report would provide a useful comparative tool for both National Parks and AONBs to measure their performance in relation to each other and as part of their own reporting mechanisms.

We believe that such information could only be provided through an OFGEM generated report.

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

Yours sincerely,



Colin White MRTPI
Planning Officer
For and on behalf of the Chilterns Conservation Board