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6 January 2009

Dear Dipen Gadhia

Review of Industry Code Governance – Environment and Code Objectives

Friends of the Lake District (FLD) is a landscape charity, covering the Lake District and Cumbria, and a company limited by guarantee. We have approximately 7000 members, represent the CPRE in Cumbria and are members of the Campaign for National Parks. Issues relating to the electricity industry have featured throughout our organisations' history and work.

FLD welcomes the opportunity to respond to the above consultation. In answer to the question "should industry and code panels take account of broader environmental impacts when considering code modification proposals" our response is yes.

The broader environmental elements noted "visual amenity, local air quality, the natural landscape, noise pollution and flora and fauna" are we believe reasonably comprehensive. A number of these e.g. local air quality, noise nuisance and flora and fauna (protected species and sites) are considered by legislation which may give Ofgem pointers on how to take account of them and measure impacts to them.

Landscape character assessment (LCA) is one way of considering impacts on both the landscape and visual amenity. It can serve as a framework for decision-making by 'unpacking' the landscape and understanding how its distinctive elements contribute to sense of place and thus how decisions that change the landscape can directly affect the quality of our lives. LCA recognises that all landscapes require tailored approaches that protect, manage and plan for sustainable development. Another element that can be taken account of where appropriate is tranquillity. The Campaign to Protect Rural England has mapped tranquillity across England. This took into account what tranquillity means to people and their perceptions of what

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friends OF THE LAKE DISTRICT

factors were most likely to add to and to detract from their sense of experiencing tranquillity when they visit the countryside.

Finally at a more operational level FLD and United Utilites have developed an surevy tool that helps to identify the most intrusive overhead wires in an area. It has been used for this purpose both locally and at locations across the country. To assess the visual intrusion of wires it considers the impact of a number of factors such as the number of wires and poles, visibility from footpaths and viewpoints and setting in the local landscape.

With best wishes.

Yours sincerely

Penny Ozanne

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Caring for the countryside in the Lake District & Cumbria

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