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Ofgem's proposed Corporate Strategy and Plan 2011-16

CNP welcomes the opportunity to contribute to the development of Ofgem's proposed Corporate Strategy and Plan 2011 – 2016. CNP is the national charity that campaigns to protect and promote National Parks for the benefit and quiet enjoyment of all.

As you know Ofgem has a statutory duty to take National Park purposes into consideration when making decisions that could affect the National Parks.¹ Defra has clarified² that National Park purposes are an essential consideration in reaching decisions that may have an impact on National Parks.

In view of this, we would like Ofgem to commit to the following within the strategy:

- A full cost benefit analysis of the impact of the current transmission system on consumers, including on their appreciation of visual amenity. This could include a national Willingness to Pay survey, which would usefully inform decisions on possible regulatory and funding mechanisms to reduce this impact
- The introduction of an innovation incentive linked to reducing the impacts of new or existing transmission networks on visual amenity. For existing lines, this could simply be a fund to which the system operator could bid; for new lines, it could provide a stimulus to explore the technical feasibility of less impactful technologies (for example, direct buried electricity or gas insulated lines, sub-sea cables or any other developing technologies) at early stages of the planning process
- A full cost benefit analysis of which regulatory approach (for example, a radial or an integrated approach) for the offshore transmission environment will have the least adverse impact on consumers, including on their visual amenity

Please do not hesitate to contact me should you require clarification of any of the above.

Yours sincerely



Amy Peters
Senior Policy Researcher

¹ Section 11A(2) of the 1949 Act as amended by section 62(2) of the Environment Act 1995 requires all relevant authorities performing any function in relation to, or so as to affect, land in a National Park to have regard to National Park purposes.

² Defra guidance note on duties on relevant authorities to have regard to the purposes of National Parks, AONBs and the Broads, 2005