

# P L A C E



The Executive Committee  
Proposed Corporate Strategy and Plan 2011-16 Ofgem (Consultation)  
Ofgem  
9 Millbank  
London SW1P 3GE

10.03.11

Dear Sirs,

## **Ofgem Proposed Corporate Strategy and Plan 2011-16**

PLACE has been working to reduce the impact of infrastructures for some 15 years now - see [www.p-l-a-c-e.org](http://www.p-l-a-c-e.org) for further information - and has been working as an Official Consultee with National Grid on its plans to renew the Stalybridge to Woodhead (4ZO) 400kV Overhead Transmission Line for over five years. We work closely with the Peak District National Park Authority, the Campaign to Protect Rural England, Friends of the Peak District and others on these matters.

We write as a result of our scrutiny of Ofgem's Proposed Corporate Strategy Plan 2011-16. We are pleased to see a strong engagement with the need for serious reductions in the UK's carbon dioxide output and welcome many of the proposals.

However, there is a strong impression in the document that Ofgem believes CO2 reduction is the beginning and end of its duties to the environment. There seems to be little appreciation, and certainly no mention of the heavy negative impact that multiple new connections to renewable energy sources would have on amenity, landscape value, property value, health and tourism not mention the more elusive existential qualities of openness, freedom from human dominance, the need for access to challenging wild spaces.

Recent meetings with National Grid and a number of other parties on the subject of the undergrounding of power lines, and an awareness of the number of opposition groups forming to resist new overhead lines is now showing that a strong public wish is not being met. Furthermore Ofgem's use of capital costing instead of life costing, which would include social and environmental costs, is confusing the whole cost issue and exposes Ofgem to the charge that it is not fully informed of the true costs of its policies.

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Overall there is a sense that Ofgem is understanding 'value and/or benefit to consumers' too narrowly. Recent protests about the future of Britain's forests are an indicator of a deep-seated public anxiety about the environment.

Ofgem strategy / policies which disregard this are likely to run into trouble.

These are fundamental matters which need to be addressed in the Corporate Strategy and we ask for a meeting with you as soon as possible.

Finally, we offer our apologies that we have been unable to meet your preferred consultation timetable for response. We are currently trying to respond fully to a number of other consultations running concurrently.

yours sincerely,

Andrew Darke

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