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Dear Anna,

RESPONSE TO OFGEM ED-1 STRATEGY CONSULTATION

Thank you for the opportunity to respond to the the Ofgem ED-1 strategy consultation.

The Trust is particularly interested in the proposals concerning the visual amenity allowance in relation to overhead power distribution lines within National Parks (NPs), Areas of Outstanding Natural Beauty (AONBs) and National Scenic Areas (NSAs), and has the following observations:

1. The Trust welcomes the continuation of the allowance and that this will be calculated according to existing methodology with no re-run of the willingness to pay survey, but having regard to the results of the DNO stakeholder consultations.
2. Discussion during the consultation has lead stakeholders to conclude that Willingness to Pay research on transmission will not be applied to distribution (para 5.51 of the consultation refers). The Trust wishes to emphasise that there will be a need to consult stakeholders again should Ofgem choose to rely on this research after this consultation has closed.
3. The consultation asks whether guidance would be helpful on the 10% of the allowance that can be used outside the designated area. Given that this has not been taken up widely the Trust feels that issuing guidance to DNOs and stakeholders would be helpful. It need only be light touch and non-prescriptive and could draw on cases where the 10% allowance has been used by DNOs in practice.
4. The Trust welcomes the proposal for the scheme also to apply to NSAs in Scotland.
5. The Trust notes that it is not the intention for the allowance to apply to wild land outside NP or NSA boundaries, and will discuss this separately with the Scottish companies.
6. Given that the allowance is public money being used for public benefit the Trust hopes Ofgem will use its best endeavours to publicise the beneficial impacts.
7. The Trust understands that Ofgem undertook to investigate the barriers to the full uptake of the allowance by each DNO, but that so far this has not been done. The

Trust would encourage Ofgem to continue investigating this issue and to report findings to stakeholders.

8. Whilst the allowance will mitigate visual impacts of distribution there is a risk of adverse impact from broadband rollout as proposed in Clause 7 of the Growth and Infrastructure Bill. The Trust would encourage Ofgem to engage with Ofcom to ensure a coherent approach.

Yours Sincerely

Sheila Wren

SENT BY EMAIL