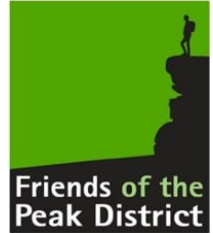




Campaign to Protect
Rural England
SOUTH YORKSHIRE



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Mark Wagstaff,
Ofgem,
9 Millbank,
London
SW1P 3GE

30 May 2013

Dear Mark,

REVIEW OF OFGEM'S IMPACT ASSESSMENT GUIDANCE

We welcome the opportunity to comment on Ogem's draft Impact Assessment Guidance. We are both the local branch of Campaign to Protect Rural England, campaigning for a beautiful and living countryside, and the National Park Society for the Peak District National Park, Friends of the Peak District. Our responses to the questions are as follows.

Q1 Impact assessment (IA) is described as '*a tool to help explain the effects of regulatory proposals which impact on consumers, industry participants and social and environmental issues.*' We welcome the proposed approach to IAs as a continuous iterative process and the intent to consider all impacts (monetised aggregate cost-benefit analysis, distributional effects and long-run, hard-to-monetise - strategic and sustainability - aspects) in an integrated manner (Ch3 Summary).

Q2 Ofgem should explicitly adopt an ecosystems approach to inform its IAs (para 2.8). At present the assessment focuses on low carbon energy production¹, visual and amenity impacts in protected landscapes, and biodiversity. The Government expects the Authority to exercise its duties and powers to have regard to the need to contribute to the achievement of sustainable development in the manner best calculated to support this goal. The UK National Ecosystem Assessment, 2011, identifies the full range of environmental goods and services which need to be taken into account. For example, the draft IA guidance emphasizes Ofgem's statutory duty to protected landscapes but landscapes everywhere are important and to them all Ofgem should apply the best practice principles as laid down in the European Landscape Convention. Ofgem's 2012 discussion paper 'Strengthening strategic and sustainability considerations in Ofgem decision making' comes close to this approach in its Natural Asset and Greenhouse Gas (GHG) Implications test.

President: [Julia Bradbury](#)

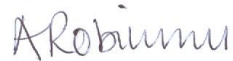
CPRE South Yorkshire and Friends of the Peak District are run by the Campaign to Protect Rural England, Peak District and South Yorkshire
for the countryside, for communities, for the future

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¹ Social and environmental guidance to the gas and electricity markets authority 2010

Q4 Two other changes that should be considered are as follows. (1) Para 2.30 lists the circumstances in which Ofgem would not expect to produce an IA including urgency and / or where carrying out an IA would be impractical or inappropriate. The draft guidance deals with the 'unimportant' situations but it would be unacceptable for an IA not to be undertaken because of urgency, which may include fast tracked projects. The first bullet in the list should be deleted. (2) The IA of any scheme should include both generation and transmission of electricity.

Yours sincerely

A handwritten signature in cursive script that reads "ARobinson".

Anne Robinson
Campaigner