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By email to: [ofgem.guidance@berr.gsi.gov.uk](mailto:ofgem.guidance@berr.gsi.gov.uk)

25<sup>th</sup> September 2008

Dear Mr Finn

**Consultation on Social and Environmental Guidance to the Gas and Electricity Markets Authority (Ofgem)**

The English National Park Authorities Association (ENPAA) exists to provide a collective voice for the nine English National Park Authorities. It is governed by the Chairs of the nine Authorities. Our response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs). Individual National Park Authorities may submit separate comments, which will draw on the specific issues for their particular area.

ENPAA welcomes the provision of new guidance to the Authority on its contribution to the achievement of the Government's social and environmental aims. And we are pleased to see recognition of the role that the Authority can play in the achievement of wider public and policy goals.

We believe the proposed Guidance should include the environmental duty placed on Ofgem with regard to the achievement of National Park purposes. The Defra guidance note '*Duties*' on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty (AONBs) and the Norfolk and Suffolk Broads', published in 2005, explains that all relevant authorities, including Ofgem, have a duty to have regard to National Park purposes. As this Defra guidance is highly relevant to the environmental duties of the Authority we believe that it warrants mention under paragraph 7.

Paragraph 6 of the consultation document states that 'The Authority must have regard to the need to secure that all reasonable demands for gas and electricity are met'. ENPAA would like to see greater alignment here with the phrasing used in the UK Government Sustainable Development Strategy 'Securing the future'<sup>2</sup>. Rather than referring to meeting 'demands', this

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strategy states as its main aim 'to enable all people ... to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations'. As expressions of 'demand' are often based on historical data, we feel that a change of wording would better reflect a commitment to promoting energy efficiency and reducing energy consumption. Indeed, we believe that the guidance should seek to implement that wider Sustainable Development Strategy as well as the Government's energy strategy (paragraph 3).

With regard to identifying other aspects of Government social and environmental policies that the Authority could contribute towards, ENPAA would welcome this as being highly appropriate. Particular aspects that we would like to see included in the guidance are the protection of landscape continued support for the undergrounding of power lines. This would be in keeping with the Government's commitments as a signatory to the European Council Landscape Convention, which was ratified in November 2006.

ENPAA is happy for our response to be made publicly available. Please do not hesitate to get in touch if we can help.

Yours sincerely,

*Meriel Martin*

Meriel Martin  
English National Park Authorities Association

<sup>1</sup> Section 11A of the National Parks and Access to the Countryside Act 1949 as amended by Section 62 of the Environment Act 1995, Section 17A of the Norfolk and Suffolk Broads Act 1988 and Section 85 of the Countryside and Rights of Way Act 2000.

<sup>2</sup> UK Government (2005): '*Securing the future: delivering UK sustainable development strategy*'