

Fiona Campbell  
Ofgem

BY EMAIL

10<sup>th</sup> May 2023

Dear Fiona

**The Wildlife Trusts comments on the future of local energy institutions and governance consultation**

The Wildlife Trusts welcome the opportunity to comment on this consultation. Our comments focus upon the proposal to introduce Regional System Planners.

The Wildlife Trusts has extensive experience in engaging at a local and national level on the most appropriate location for infrastructure to ensure that sustainable development can go ahead whilst ensuring each development proposal results in a positive impact on the environment. This approach ensures that Environment Act targets to achieve nature's recovery can be achieved.

The Wildlife Trusts also has extensive experience in energy planning. For example, we hold a place on the Offshore Transmission Network Review Expert Advisory Group and the Environmental-sub group for the Holistic Network Design.

Please find further details in relation to the question on Regional System Planners as outlined in the consultation response below.

**Section 3: Proposed governance reform: energy system planning**

**Q1: Do you agree with our proposal to introduce Regional System Planners as described, who would be accountable for regional energy system planning activities? If not, why not?**

Regional System Planners could have benefits if the approach ensured that local expertise was taken into account. For example, The Wildlife Trusts has detailed knowledge and expertise of the local environment which would be invaluable in planning energy systems at a regional level. Therefore, it would be essential that non-statutory organisations such as The Wildlife Trusts were identified as a key stakeholder to engage with alongside other statutory organisations such as local authorities.

A regional approach would also ensure that duties to take into account the environmental impacts of energy developments would be met e.g. Schedule 9 of the Electricity Act 1989.

It would be essential to ensure that the Regional System Planners role was closely linked with national work to develop the Central Strategic Network Plan. This would ensure that a holistic approach was taken to onshore-offshore energy system planning to ensure environmental impacts are reduced on both land and sea.

We would like to better understand if Regional System Planners would have a role in the planning of energy system planning in the marine environment. If so, marine experts would also need to be engaged such as The Wildlife Trusts, Natural England and the Marine Management Organisation.

Finally, we highlight that if Regional System Planners were established and responsible for energy system planning at a regional level, environmental impacts would need to be considered. This could be assisted through the implementation of plan level Habitats Regulations Assessments (HRA) and Strategic Environmental Assessment (SEA). HRA and SEA are both useful tools to identify at an early stage the environmental impacts and solutions required to reduce both consenting risk and delay alongside reducing environmental risk.

The Wildlife Trusts would be happy to discuss the proposal for a Regional System Planner in more detail with Ofgem.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Edwards', written in a cursive style.

Joan Edwards  
Director, Policy and Public Affairs