



**WWF Scotland**  
CodeBase Edinburgh  
Argyle House  
3 Lady Lawson Street  
Edinburgh EH3 9DR  
  
Tel: 0131 659 9100  
scotland@wwf.org.uk  
wwfscotland.org.uk

Reference: RIIO-3 Draft Determinations

26 August 2025

To whom it may concern,

I am writing in response to Ofgem's RIIO-3 Draft Determinations, published on 1 July 2025, which outline the framework for UK electricity transmission network investments between April 2026 and March 2031.

WWF Scotland is fully supportive of the energy transition, and we recognise that renewables are at the forefront of delivering the targets needed to tackle climate change. The planned expansion and modernisation of Scotland's electricity transmission network will be central to enabling this transition. However, it is vital that these investments are designed not only to deliver net zero outcomes but also to be nature-positive, ensuring that the energy transition contributes to the recovery of Scotland's ecosystems rather than exacerbating biodiversity loss.

Scotland's natural environment is under serious threat. Recent assessments indicate a 49% decline in the average abundance of seabirds since 1986, and 11% of species found in Scotland are now classified as threatened with extinction. These statistics reflect decades of habitat loss, pollution, and climate pressures. Given these trends, it is no longer enough for infrastructure projects simply to avoid harm. We must go above and beyond basic mitigation, actively restoring degraded habitats, enhancing ecosystems, and creating opportunities for biodiversity to thrive.

WWF has demonstrated that large-scale, ambitious interventions can deliver measurable ecological recovery. Ecosystem restoration, such as our contribution to restoring seagrass and oysters in the Firth of Forth, alongside other marine restoration initiatives across Scotland and the UK - including seagrass and oyster habitat projects in Argyll, Solway Firth, Solent and North Wales - have shown that coordinated, large-scale restoration can successfully reverse local biodiversity declines and provide wider ecosystem benefits.

The scale of upcoming electricity transmission development in Scotland is significant, with new lines, substations, and associated works expected to affect sensitive coastal and marine habitats. Without proactive nature restoration, these developments carry reputational risks and could result in public pushback, potentially delaying projects and undermining a fair transition to net zero for workers, communities and consumers. To address these risks, Ofgem should prioritise funding for low-carbon construction methods and materials, ensuring infrastructure reduces embedded emissions and aligns with national climate targets. Equally, the regulator should support species and habitat restoration initiatives,

WWF Scotland is an office of WWF-UK. WWF-UK a charity registered in England and Wales number 1081247 and in Scotland number SC039593, a company limited by guarantee registered in England number 4016725. VAT number 733 761821.  
Registered office: The Living Planet Centre, Rufford House, Brewery Road, Woking, Surrey GU21 4LL

Chief Executive: Tanya Steele CBE

enabling transmission operators to actively compensate for ecological impacts while contributing to Scotland's national and global biodiversity objectives.

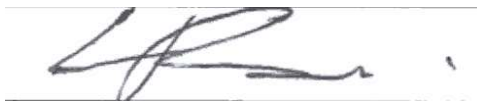
WWF Scotland notes that every transmission operator has proposed delivering biodiversity outputs in its Environmental Action Plan that aim to go above and beyond current legal requirements. We support ambitions to deliver marine restoration and strategic conservation measures, including ecological monitoring, invasive species removal, and habitat enhancement in high-impact areas. Integrating these measures into RIIO-3 funding would allow transmission investments to deliver tangible biodiversity gains alongside the decarbonisation of Scotland's energy system. By embedding nature-positive principles into infrastructure planning and delivery, we can ensure that each new project leaves ecosystems in a better state than before.

We agree that proposals for significant spend should demonstrate consumer value. However, it does not appear that Ofgem has embraced a sufficiently wide definition of consumer value, given the strong public interest in and support for restoring nature across the UK and the potential for nature recovery to generate significant social and economic benefits for consumers over the longer term<sup>1</sup>. By funding proactive restoration measures and embedding nature-positive principles into RIIO-3, Ofgem can ensure that Scotland's electricity network not only supports a fair transition to net zero but also delivers measurable ecological recovery. This wider approach to consumer value reflects public priorities and strengthens the case for investment. Importantly, transmission operators should also consider what they can contribute in addition to public funds, particularly where financial returns or profits prove greater than anticipated during this regulatory period. Such commitments would not only share benefits more fairly with society but also reinforce public confidence that the sector is delivering a just and environmentally responsible transition.

Going beyond minimum mitigation is essential. The electricity transmission sector has a unique opportunity to demonstrate that industrial-scale infrastructure can actively restore and enhance nature. Every kilometre of cable, every substation, and every high-impact intervention is an opportunity to reverse biodiversity loss, restore degraded habitats, and strengthen ecosystem resilience, while also safeguarding public support and trust in energy projects

We urge Ofgem to ensure that RIIO-3 provides robust mechanisms to fund low-carbon, nature-positive infrastructure and proactive restoration initiatives. Doing so will secure a lasting legacy of ecological resilience, demonstrate leadership in integrating the needs of people, climate, and biodiversity, and position Scotland as a global exemplar for sustainable energy infrastructure.

Yours faithfully,



Lang Banks, Director  
WWF Scotland

---

<sup>1</sup> See WWF and GFI report, August 2025: [Business Investment in Nature: Supporting UK Economic Resilience and Growth](#)