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Dear FWP team

I note that your FWP will confirm the governance and methodology for spatial energy planning, both at the national and regional levels, to develop pathways to net zero by 2050 at least cost. Also, that you will work with the Government to improve the energy sector's resilience to climate change.

I suggest that your work might embrace the role that the energy sector could play in delivering climate adaptation and energy resilience, to ensure that consumers are protected through regulation and receive good value for money from investment in low carbon generation technologies.

In this regard, the National Assessment of Flood Risk (NaFRA) and National Coastal Erosion Risk Map (NCERM), recently updated by the Environment Agency, will need to be considered in the process of updating Shoreline Management Plans. This involves Local Planning Authorities. I imagine one focus of interest might be the cost of insurance cover and/or its removal from their areas.

Taking the Severn Estuary as an example, whilst it is estimated that it could meet 7% of UK demand for clean power, it is bounded by a Western Gateway shoreline that is a good 500 miles long. Large sections are owned by the Government through the Crown Estate and the growing risk of flooding and erosion raises the option for management using the Regulated Asset Base model to attract private investment in tidal range energy infrastructure with a dual use as defences against flooding, rather than itself being in need of expensive tax payer protection.

Also, the proximity of large indigenous offshore resources of predictable tidal range energy to existing demand centres and grids, offers potential for a cheaper, faster way of delivering network infrastructure onshore in a whole system that provides lowest cost to consumers and to future generations of household and business tax payers increasingly in need of protection against sea level rise, storm surges and extreme weather events.

Best wishes

Don Snow

Director of Sustainable Development

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