



TWT briefing in response to Ofgem Consultation on Regional Energy Strategic Plans

Deadline 8 October 2024

Thank you for consulting on the design of the Regional Energy Spatial Plan approach. Please find a briefing, by way of response, from The Wildlife Trusts below. This consultation specifically refers to RESPs in England.

The Wildlife Trusts are a grassroots movement of 46 charities with more than 900,000 members and 39,000 volunteers - working to transform the environment in which we live: restoring, creating and connecting wildlife-rich spaces to secure nature's recovery at land and sea; and helping to ensure that nature is part of everyone's lives. We are actively engaged in the planning system working with local planning authorities and developers to both: avert threats and negative impacts on the natural environment; and promote positive opportunities and solutions to support its recovery.

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We welcome a new approach to strategic spatial planning for energy: this is imperative if we are to address the interlinked nature and climate crises together. To achieve this, we recommend 5 areas for further work in relation to RESPs. To facilitate analysis, we have identified the questions to which the recommendations most closely align with.

Recommendation 1: RESPs should help meet legally binding climate and nature targets

The recommendation links to Question 1 and Question 2.

The UK Government has set legally binding targets to reach net zero and to halt and reverse the decline in nature. RESPs should seek to identify their contribution to meeting these targets.

RESPs should support an ambitious approach to the adoption of more sustainable choices, including improving energy efficiency of existing buildings, the use of local energy schemes and the installation of solar panels on roof-tops. These actions should seek to exceed the Future Homes Standard and building regulations.

Our recommendations 3 and 4 identify steps to ensure nature is embedded in RESPs.

Recommendation 2: Ofgem should work with others to ensure join up between national, regional and local planning

This recommendation reflects on paragraphs 2.22-2.24.

The ecosystem of energy planning is complex, with many moving parts. The interaction and relationship between national strategic planning for energy (via the CSNP and SSEP) and local level (Local Energy Plan, Strategic and Local Plans) needs to be clarified.

RESPs should also integrate the Land Use Framework in England, once it is developed.

This clarity is essential to facilitate engagement with local stakeholders and communities. (Recommendation 5).

Recommendation 3: Nature is represented on the strategic board of RESPs

This recommendation links to Questions 10, 11 and 12.

Well-located, well-designed and well-managed energy developments (including onshore wind, solar, storage and grid connections) can deliver for net zero and nature recovery. In order for RESPs to integrate nature considerations into decision making at an early stage, Strategic Boards in England should include at least one representative from the nature sector, including Natural England and the Environment Agency.

Recommendation 4: Local Nature Recovery Strategies should inform RESPs (Question 7)

This recommendation links to Questions 4, 7, 10, 13 and 14.

Local Nature Recovery Strategies (LNRS), in development across England, provide a valuable tool to input into RESPs and should be used to strategically plan investments for new development so that they protect important habitats and areas prioritised for nature recovery. This should help facilitate the protection of biodiversity and enable projects to identify how they could support nature recovery.

To facilitate this, it would help to map the regions in line with the boundaries of responsible authorities – who are tasked with developing LNRS. The boundaries of LNRS generally align with County, Unitary or Combined Authority boundaries.

A map of responsible authorities can be found here:

[Map_of_local_nature_recovery_strategy_areas_and_responsible_authorities.pdf](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/Map_of_local_nature_recovery_strategy_areas_and_responsible_authorities.pdf)

(publishing.service.gov.uk). While making comparisons between PDF maps is more difficult than a GIS comparison, we would particularly draw Ofgem's attention to potential lack of alignment between the preferred approach in the following areas:

- South West, the South East and England's Economic Heartland
- East Midlands and the North East, Yorkshire and Humber
- Greater London and the East/South East regions.

Alignment between LNRS areas and the regions for RESPs could also facilitate the identification of stakeholders to participate in the Boards.

Recommendation 5: Local stakeholders and communities need to be informed about when and how they can influence decisions that affect them.

This recommendation links to Question 9.

It is important for stakeholders to be able to influence at the point key decisions are made, with national and regional plan consultations and engagement made relevant to them.

The complexity of energy planning – which has several moving parts at the moment – can make it challenging for local stakeholders and communities to positively engage in the process.

Ofgem should work with NESO to ‘tell the story’ of energy planning so that it is made clear, in non-technical language, when and how local stakeholders and communities can engage in decisions that affect them.