



Electricity Transmission Network
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Dear Electricity Transmission Network Acceleration Team,

East Suffolk Council (ESC) welcomes the opportunity to comment on the community benefits consultation and has set out our responses to the questions asked below.

- 1. What are your views on how community support for electricity transmission network can be improved? This includes any electricity transmission network infrastructure developed by Transmission Operators and developers within scope of these proposals. We would welcome supporting evidence if available.**

Prior to the consideration of community benefits, there are several factors which must be taken into account during the consenting process. Firstly, it is essential that effective and genuine community engagement is undertaken by developers that offers the community a real choice. Alongside this, there needs to be clear messaging and understanding regarding the need case for infrastructure and connection locations, including specific geographic need cases and clear justifications for the proposals and solutions identified. There is limited transparency in the process, the network is currently planned with no involvement with affected communities, achieving community consent at this stage will be very challenging, if not impossible, but can only be achieved through effective community engagement and transparency within the process. Secondly, we need a strategy that explicitly embraces the approach that prevention is better than cure; that alternatives to onshore developments, such as offshore platforms/grid, feeding into brownfield sites are fully assessed and explored before onshore impacts are assumed. This needs to be done in an explicit transparent way. This also includes the need to reduce energy demand and therefore the degree of generation required through energy efficiency measures. Thirdly, the sense that the radial approach to bringing offshore wind energy onshore is driven by cost factors that exclude cumulative community and environmental costs, is palpable at meetings of all levels. In order to improve community support, this needs to be countered; the promise of community benefits alone will not be enough.

Overall, the principle of the need to provide benefits to communities who host strategic infrastructure, which is for the benefit of the nation, but the impacts are experienced locally, is fully

supported. ESC has written to the government previously recommending such an approach. Whilst community benefits are not a new idea, given the scale and the rate of infrastructure delivery necessary to meet net zero and climate resilience, it is now more than ever before, necessary for there to be a clear, consistent, and fair mechanism for its provision.

It is, however, essential that promoters understand that community benefits are in addition to the need to comply with the mitigation hierarchy, which requires compensatory measures should it not be possible to avoid, reduce or fully mitigate an impact or impacts of a proposal. It is essential that promoters/applicants are required to adhere to the mitigation hierarchy and do everything they can to minimise the impacts on local communities and the environment and to work collaboratively with other promoters in the same geography to do the same. It is important that they engage the local community at the earliest opportunity to communicate how this has been achieved. ESC also supports the National Infrastructure Commission who has recommended that *“Government consider whether more generous compensation arrangements for impacts would reduce potential local opposition”*¹.

The introduction of community benefits on a promotor led basis is welcomed, however there is also a need for a wider recognition of the burden placed on specific geographical locations, from the development of multiple nationally significant infrastructure projects either occurring concurrently or consecutively. This would be in the form of strategic funding, based on a model such as the Shale Wealth Fund, in addition to the project specific funding.

It is also worth noting that in 2013 the Written Ministerial Statement from the then Energy Minister Michael Fallon, announced a package of benefits for the communities that host any new nuclear power stations. It was understood that this would be delivered over two phases. The first phase associated with business rates retention and the second phase providing an annual payment funded by the then Department of Climate Change from 2030 onwards. It was understood that during the time between 2013 to 2030 the Government would *“extensively discuss the implementation of this funding with each local area to determine how the needs of the community may be best served”*. Engagement on this is still awaited. Further clarification in relation to the timings of this is necessary going forwards.

The introduction of project level community benefits as stated above is welcomed, however it must be mandatory and the scope at present is too narrow and needs to cover a greater range of infrastructure projects. This has been discussed further under question 2. In addition to the need to ensure infrastructure of an appropriate scale provides appropriate community benefits, it is important to ensure that multiple funds from different projects can be combined and a holistic

¹ National Infrastructure Commission, Delivering net zero, climate resilience and growth - [NIC-Planning-Study-Final-Report.pdf](#)

approach taken to the delivery of the benefits, as desired. It is important that the full benefit from multiple community benefits packages provided in the same broad area can be optimised.

ESC also supports the National Infrastructure Commissions recommendation that *“the government, regulators and developers should consider the merit of socialising costs through utility bills or public expenditure to extend the benefits of projects which deliver national but not local benefits to local communities”*. It is agreed that incurring increased costs early in a project could help to reduce consenting delays and ultimately reduce costs for consumers overall.

Finally, ESC would like to request that parish and town councils are effectively engaged with the community benefits proposals, part of this should include the publication of all documents and information so that all the material is publicly available.

2. Do you agree with the proposed types of infrastructure and projects we would include in these proposals? Please explain why.

It is noted that the proposals in the consultation focus on the infrastructure associated with the onshore electricity transmission network above 132kV and the offshore electricity transmission network related to offshore wind projects and interconnectors. Whilst it is fully supported that community benefit schemes should be applicable to this infrastructure, there is no mention of the infrastructure associated with other energy generating technologies. Storage technologies have also not been included within the scope of the proposals.

The Government provided a clear steer within the Business Energy Security Strategy in relation to support and ambitions for other technologies including utility scale solar parks, in addition to offshore wind, this indicates their expectation that the supply of these technologies will need to significantly increase to meet net zero by 2050. Due to the significant impacts the infrastructure associated with these technologies could have, it would only be sensible to include these within the scope of community benefits to ensure the guidance is fit for now and the future. The nature of this infrastructure is such that, like the electricity transmission network, the impacts of the projects will be experienced locally but the benefits felt nationally. The scope of the types of applicable infrastructure is considered too narrow.

The inclusion within the scope of the proposals, projects which have not yet commenced construction at the time the guidance is published, is supported, although it is recognised that this may be challenging for some developers if they have already reached their Final Investment Decision stage. This would however not include projects commencing prior to the guidance being published which is unfortunate and further thought should be given to projects in this category.

The community benefits guidance to be published in 2023 needs to be clear and comprehensive so that it is not ambiguous which promoters and projects the community benefits guidance is applicable to. Included within this guidance should be definitions of specific terms utilised, for example to avoid confusion and debate about the point of 'commencement', the term should reflect the definition set out in the relevant Development Consent Order.

3. What are your views on government's preferred approach of a voluntary benefit scheme underpinned by government guidance (covering both wider and direct community benefits)? Please explain why and provide any supporting evidence if available.

The provision of community benefits should be mandatory to ensure that all communities hosting infrastructure are treated in a fair and consistent manner. There is a concern that without a requirement or a mechanism compelling a promotor to adhere to the guidance, it will be too easy for the promotor of a project to decide not to provide any community benefit or provide a level lower than that prescribed within the guidance. There is also a risk of the reverse occurring, community benefits being seen as a means to 'buy' acceptance from the local community if it remains voluntary with no clear guidance and methodology.

Community benefits is not a new concept, some promoters provide differing levels of benefits for their schemes currently, non-compulsory guidance is therefore likely to have limited effect on the status-quo.

ESC has provided further information on the government's focus on wider and direct community benefits in Question 5.

4. What are your views on the information we have proposed to include within government guidance? This includes identifying eligible communities, consultation and engagement, governance and delivery and funding.

The provision of guidance on eligible communities is welcomed. This should include details on how the community is to be defined. This definition needs to be sufficiently widely defined to ensure that key groups affected are not excluded. Further guidance is also required in relation to how decisions would be made on the community benefits funding.

Early and continued engagement with local communities is essential. The guidance should make it clear that engagement needs to be effective and ongoing and therefore should be included throughout the consenting and post consenting process. It is also important that engagement is widespread to ensure that voices from all sections of the community are heard and taken into consideration.

It is considered that the guidance should provide further information on the type of projects which could be funded. EirGrid who operates and develops the electricity transmission grid in Ireland, has produced a Community Benefits Policy² which identifies Community Benefits Streams, setting out three core areas; sustainability, community, and biodiversity, and identifies a broad range of projects within each stream. This type of information could be valuable to communities engaged in the community benefits discussions. This would not preclude other types of projects being funded, but it would help to initiate the conversations and discussions.

It is noted that the guidance will cover the delivery phase of the project, this will need to ensure that there is a consistent reporting and monitoring approach for the funding, so it is clear what the money has been spent on and this can be reviewed against the initial community expectations.

It is not clear at present what funding will be available to help resource the local communities' engagement in this process. It is unlikely that the communities will have the necessary resource available to effectively engage on community benefits without appropriate support. Further clarity is also required regarding the level of engagement required by local authorities and similarly, whether there would be funding available to resource this.

The guidance should provide a clear methodology for calculating the amount of community benefit to be provided. It should be clear to the local community the benefits they should expect from the projects they are hosting. This could then allow some proactive work to take place and help to ensure that positive outcomes from the provision of the benefits are maximised.

In addition to the provision of a clear methodology, the guidance should set out the choices for community benefits, this will then provide a clearer framework but allow flexibility for communities to make decisions on their preferences.

Finally, whilst it is acknowledged that the local community would be the decision makers, it is unclear at present who the recipient of the funding would be. For example, local Councils could act as accountable bodies for this funding, or a local community vehicle could be constructed. Councils have the benefit of experience and are already in place with established processes, whilst a community vehicle although may be more complex to establish, could provide for greater community ownership. The guidance should seek to provide further clarification on this matter.

5. Do you agree with the government's proposals to focus on direct and wider community benefits, choosing not to pursue options such as community ownership and electricity bill discounts? Please explain why.

² Community Benefits Policy, EirGrid - [209130-EirGrid-Community-Benefit-Policy-A4-Report-final.pdf](https://www.eirgridgroup.com/209130-EirGrid-Community-Benefit-Policy-A4-Report-final.pdf)
([eirgridgroup.com](https://www.eirgridgroup.com))

It is considered that community ownership should be included within the proposals. Community ownership allows communities to share in a range of the benefits of the infrastructure including developing a sustainable income stream and fostering stronger partnerships between the owner and community.

In addition to this, it is considered that electricity bill discounts should not be discounted at this early stage, especially at a time when energy prices are so high. The energy payments scheme which was introduced by the then Department of Business, Energy, and Industrial Strategy to ease the cost of energy for consumers, has demonstrated that discounts on electricity bills and the issuing of discount vouchers is possible.

Notwithstanding the above, it is understood that the inclusion of community ownership and electricity bill discounts could potentially delay the delivery of the community benefits proposals due to the complexity of the issues involved. If this is the case, to avoid a delay an alternative could be to include a commitment to update the guidance within a set timeframe to include the additional elements later. This would then allow the community benefits proposals to continue to be enacted on their current timeframe. It is agreed that a significant delay to this timeframe would not be welcomed.

In addition to the nature of the funding, the longevity of the funding is also important and can significantly change the spend opportunities available and the benefits obtained. Community benefits should be payable until decommissioning of the infrastructure, unless alternative arrangements are agreed with the community, but this should not decrease the overall sum received.

6. How do you think guidance could be developed most effectively? How should different stakeholders be involved?

It is essential that any published guidance is sufficiently agile to be able to react and respond to changing circumstances and therefore it should be regularly reviewed and include a simple mechanism for updates.

The establishment of workshops can be an effective and efficient mechanism to engage multiple stakeholders simultaneously. It is important to however ensure that all voices are heard, and stakeholders are fairly represented.

7. How do you think the effectiveness of this approach should be evaluated? Please explain why and provide any supporting evidence.

The approach could be evaluated through the use of questionnaires or case studies.

8. Do you have a preferred approach to how the level of funding should be calculated? Why is this your preferred approach?

It is not considered that the level of funding should solely relate to the cost of the project. A smaller, more costly, less impactful project should not pay a greater sum than a larger, less expensive, more impactful project. Such an approach could result in a scenario where the employment of innovation and novel techniques to address the impacts of infrastructure, which could increase the cost overall, are held back due to the implications for the level of community benefits funding. It is considered that a more appropriate approach would be to set the level based on the parameters of the infrastructure. For example, for an overhead line, this could be based on a sum of money per kilometre.

The methodology for calculating the funding should be clear and available to all, to ensure that all stakeholders can perform the calculations and gain an understanding of the expected benefits.

9. What level of funding do you believe is appropriate? Why do you believe this? Could you please provide any evidence or data as to how you have come to this calculation.

ESC considers that the funding should be based on parameters of the project and calculated using a clear and transparent methodology, so all communities are treated fairly. For example, the Scottish Guidance on good practice principles for communities, business, local authorities, and others³, promotes a figure of £5000 per installed megawatt per annum, index linked for the operational lifetime of the project. This is not to say that the funding should be calculated this way, it just provides an example of a methodology which is currently being used in practice in Scotland.

10. Is there anything further we should consider as part of next steps?

ESC welcomes the commitment that the next steps will include close consultation and engagement with Ofgem, industry and community representatives and that further social research will be undertaken looking at how community benefits should be delivered. It is also supported and welcomed that it is the intention for the guidance to apply across Great Britain.

As previously stated, community benefits should be mandatory. As such benefits cannot easily be secured through the planning system, it is considered that funding should be secured through an alternative mechanism. For example, this could be as part of the financial support settlements or

³ Community benefits from onshore renewable energy developments, 2019 - [Executive Summary - Community benefits from onshore renewable energy developments - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/community-benefits-from-onshore-renewable-energy-developments/pages/2019-executive-summary-community-benefits-from-onshore-renewable-energy-developments.aspx)

capacity auctions. It could comprise a requirement of the Contract for Difference process, or other such similar funding mechanism, and should be the provision of a set amount of community benefits calculated based on an agreed methodology. It is however important that it is clear in whatever mechanism is utilised, that the funding is payable on commencement, irrespective of whether consent or any financial arrangements pre-date publication of the guidance. The next steps should include further consideration regarding how the funding will be secured.

11. Do you agree with the rationale for intervention and the market failures we have identified? Are there any points we have missed?

ESC supports the rationale for intervention provided in the consultation. In the absence of a mandatory intervention, it is not considered that community benefits will come forward in a fair and consistent manner.

12. Do you agree with the impacts that have been identified? If not, explain why with supporting evidence.

The report identifies 'familiarisation costs' as a potential impact which is supported. The document however only recognises that transmission owners and developers could incur time costs to familiarise themselves with the new guidance. The document does not acknowledge the potential cost to host communities. Host communities are unlikely to be able to resource engagement with potential community benefits funds without greater guidance and resource support. Similarly, the same can be said for local authorities, although the level of involvement expected from local authorities is unclear at present.

13. Do you think there are other impacts that have not been identified? If yes, what other impacts are there that have not been included? Please provide supporting evidence.

ESC has no comments.

14. Please provide any data and evidence to support a detailed assessment of each of the impacts.

ESC has no comments.

15. Please provide any data and evidence on whether this policy is likely to reduce delays to transmission network build and how long by.

Given the scale and rate of infrastructure delivery necessary in the coming years, ESC agrees that the provision of more tangible, direct and mandatory community benefits to those communities

hosting national infrastructure has the potential to help facilitate greater community acceptance. As stated in the response to Question 1, this needs to be supported by greater effective engagement and transparency. It is considered that this could help to reduce the consenting delays caused to some infrastructure projects.

ESC will defer to the project promoters to quantify the degree project delays would be reduced and provide predictions or estimations for time savings.

16. Are there any groups you expect would be uniquely impacted by these proposals, such as small and micro businesses or people from protected characteristics? If yes, which groups do you expect would be uniquely impacted? Please provide supporting evidence.

Fundamentally there will be a specific core group within the community who will be directly affected by the construction and operation of large-scale infrastructure. They will be those who will live day to day with the direct visible and potentially audible generation, transmission, or storage infrastructure, being burdened directly with the adverse impacts on behalf of the wider UK energy security and strategy. It is important that this select group is specifically identified, which could be using a distance from site calculation, and they directly benefit from the proposals. This is of even greater importance when the same core group is then burdened with the impacts of multiple concurrent or consecutive projects. The eligible community is likely to be wider than this core group.

One of the biggest influences on the running of businesses in the tourist sector comes from variations in demand and visitor spending. Temporary construction activities, but especially, permanent infrastructure associated with electricity networks and generation projects can have an impact on both visitor numbers and spending. Local tourist businesses should be taken into consideration and have the potential to influence decisions on community benefit spending.

If you would like to discuss any of the above responses further, please do not hesitate to contact me.

Yours sincerely,

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East Suffolk Council