



## **Wales Safer Communities Network response to: Department for Energy Security - Community Benefits for Electricity Transmission Network Infrastructure**

Closed 15 June 2023

Response submitted via the online survey.

### **Questions**

**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.**

It is important to ensure there is clear, jargon free community engagement both in person and written. The ability to effectively remove any inaccurate or false information or at least to challenge it with properly evidenced information. An example from a similar field is the G5 masts conspiracy theories where the masts have been blamed for all manner of issues including illness and covid-19.

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

We think that it should cover all land-based infrastructure irrelevant of the energy source, and should be applied for all future sources of energy which may already be underdevelopment or that are yet to be developed using any of the earths elements including wind, water (tidal and inland), gas, fossil fuels, nuclear and solar but could be expanded to more individualised methods of production which is then shared through the infrastructure to where it is needed for work, home or leisure activities.

**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.**

This would appear appropriate on paper, however there is a significant risk that with the increased development for electricity transmission network infrastructure in the coming years there is a possibility that the pressure to deliver will allow an excuse and non-compliance with a voluntary benefit scheme to meet deadlines for delivery and demands of the infrastructure itself.

The companies themselves have shareholders to pay and infrastructure is always resource heavy so the potential pressure from shareholders and others could result in the voluntary benefit being lost. This is seen in some instances where section 106s for housing developments are agreed at planning and then on occasion the amount and scale reduced during the actual development itself, leading to reduced infrastructure and other community benefits that were part of the initial planning agreement.



**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.**

We would recommend that there is more engagement with local public bodies, such as local authorities, fire and rescue services, police and third sector organisations who already know the issues that communities are facing, and work to evidence-based approaches or look to innovate ideas to enable community cohesion and reduce community safety issues. The infrastructure itself can be subject to community safety issues, whether it is anti-social behaviour (including graffiti), theft leaving exposed infrastructure or organised crime using the infrastructure to illegally access the energy potentially in ways that put other community members at risk. Working with the Police to 'Design out Crime' would alleviate some of the anticipated risks when developing new building projects.

The network of community voluntary councils in Wales including the national body (WCVA) are all partners in Third Sector Support Wales, and are already experienced in the awarding of community grants and funding and have access to a wider range of partners working with a wider range of communities. It is well documented that formal consultation and engagement only reaches certain individuals, by utilising the existing bodies wider engagement may be achieved.

The suggestion for community benefit to include elements such as electric vehicle charging points, appears to be about delivering more of the infrastructure, whereas an e-bike awareness course or educating e-car users around the acoustic vehicle alert system (AVAS) and benefits to cyclists and pedestrians when the car makes a noise through either local, targeted or national campaigns could make for safer communities and prevent injuries through the use of an item that is partially powered through the infrastructure network.

**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?**

The Network does not hold an opinion in this respect, other than to say if community ownership is considered then how would quality standards be maintained to ensure the safety of members of the public who live, work or visit those geographical areas.

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

Third sector membership bodies such as WCVA (Wales) and NCVO (England) should be commissioned to develop with engagement with public bodies. The guidance should allow for repeat funding and not fall into the trap of always needing to deliver something new as other grant programmes have done. If the removal leaves a gap which will lead to a decrease of wellbeing in the community, environment or individuals then continuation of funding local community benefits should be possible.



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

The evaluation could focus on the amount and percentage of funding that has gone into community benefits and where and how it has made differences. It should not focus on the number of people who specifically benefit as that may negatively impact on more rural communities where most of the infrastructure may be and yet the numbers that are seen to benefit are limited by the limited number of homes.

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

We have no preference on how the level of funding should be calculated.

**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.**

We have no specific option on the level of funding, other than due to the monopoly situations of the transmission network operators (TOs) that the funding level should be higher than any dividend payments made to shareholders who are individually benefitting from bill payers payments.

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

There is a need to consider what the actual community benefits are and what is just part of the infrastructure that should be being developed, as the proposals in the consultation all appear to be for the later but community benefit is so much wider than can a person access a charging point for their car (which they are also paying for). It is perhaps worth pointing out that for some places of residences without access to charging points, access away from their dwelling will be a requirement and should not be considered a benefit.

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

We agree with the rationale for intervention and the importance of becoming carbon-zero and the lack of consistency between the TOs needs to be changed for transparency and also so local communities and public bodies have a clear knowledge and understanding of what funding should be coming through the public benefit. There is a risk that if it remains a voluntary scheme that levels and delivery will continue to be fragmented and a post-code lottery for what benefits are delivered will ensue; not due to the amount of infrastructure there is but based on which TO and how social conscious they are.

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

No, there is nothing around the cost or resources for local authorities and others that are involved in the planning and regulatory aspects of the delivery of infrastructure that runs above and under ground.



**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.**

Yes, please see the answer to question 12.

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

No additional information to provide.

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

No comment.

**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.**

Those with higher electricity use are likely to be negatively impacted, such as those with an illness or disability and their unpaid family carers.

The availability of information, updates and consultations (both verbal and written) through the Welsh language medium needs to be taken into account where any part of the infrastructure is in Wales.