



Response to the consultation on scheme design for bill discounts for new transmission network infrastructure

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This response is submitted in relation to the consultation on scheme design for bill discounts for new transmission network infrastructure. It is a joint submission by Dr Rebecca Windemer from Regen and Professor Patrick Devine-Wright from the University of Exeter. Both are members of the ESRC-funded ACCESS network.

About Regen

Regen provides independent, evidence-led insight and advice in support of our mission to transform the UK's energy system for a net zero future. We focus on analysing the systemic challenges of decarbonising power, heat and transport. We know that a transformation of this scale will require engaging the whole of society in a just transition.

Regen is a membership organisation with over 200 members who share our mission, including clean energy developers, businesses, local authorities, community energy groups and research organisations across the energy sector. We manage the Electricity Storage Network (ESN) – the industry group and voice of the grid-scale electricity storage industry in GB.

About the University of Exeter

The University of Exeter is a world-leading UK university, part of the prestigious Russell Group, offering outstanding research and teaching across three campuses in the South West.

Professor Patrick Devine-Wright

Patrick Devine-Wright is an environmental social scientist with a primary interest in sustainable energy transitions, specifically social acceptance of low-carbon technologies, community engagement and people-place relations. He is the director of the £6.25m ESRC-funded ACCESS (Advancing Capacity for Climate and Environment Social Science) leadership team that aims to increase the visibility and impact of social science contributions to tackling environmental problems. He has considerable experience advising policy and practice across scales, including as Lead Author for the Intergovernmental Panel on Climate Change, as a member of the DECC-Defra Social Science Expert Group, and Chair of the Devon Net Zero Task Force.

Executive summary

We welcome the government's proposals to provide a range of community benefits to those affected by new transmission network infrastructure. We particularly support the combination of direct bill discounts, wider community funds, and guidance on good engagement, which together can deliver meaningful local value. Our response focuses on a small number of specific areas where further consideration could help ensure the scheme achieves its intended benefits while keeping fairness at its core.

It is essential that decisions on the scheme are not taken in isolation. Clear and accessible communication with communities, procedural fairness, and robust monitoring will be key to maintaining trust and ensuring the scheme delivers its benefits equitably.

As set out in more detail below, our key recommendations are as follows:

- Define spatial boundaries for community benefits based on visual impacts and topography to ensure all affected properties can participate.
- Ensure the opt-in process is widely accessible, supported by capacity-building and awareness-raising, monitored for fairness, and extended to all directly affected stakeholders, including hard-to-reach communities and impacted businesses.
- Clearly publicise, in an accessible format, the rationale for the 10-year scheme duration, the proposed discount amount, and the 500m distance threshold.

The need to consider topography

- We are concerned with the design of the suggested provision for a financial benefit scheme based on households living within a fixed distance (500m) of transmission infrastructure. We believe there is a significant risk that this measure could cause unintended conflict within communities and between communities and grid operators, reducing community acceptance of new transmission infrastructure.
- The use of a fixed distance as a qualifying criterion is a poor proxy for actual impact and fails to consider local topography. For example, a household situated behind a hill, with no visual or perceptible exposure to the infrastructure, might still qualify for compensation purely based on proximity. In contrast, a home with high visual impact, a short distance beyond 500m, would not. For this reason, such a mechanism does not ensure fairness and will also not provide value for money to the bill payers who are ultimately paying for this.
- Research conducted by the University of Exeter on behalf of the Irish grid operator EirGrid, which examined community benefit schemes, found that relying on 'objective' distance thresholds often led to unintended and inequitable consequences.¹ In one case, an entire settlement was split arbitrarily due to a proximity measure, with households on one side of a street qualifying for community benefits while neighbours just metres away on the other side of the street did not. A system in which a home situated 500m from a line is treated differently from one 499m away highlights the inherent unfairness of rigid spatial cut-offs.
- Evidence from peer-reviewed social science research suggests that fair outcomes in the
 context of electricity transmission infrastructure are not achieved through predefined,
 distance-based criteria.² Uniform treatment based on objective space does not equate
 to equity. In fact, such an approach may foster greater resentment, reduce community
 consent and contribute to delays precisely the opposite of its intended effect.
- Instead, we recommend defining spatial boundaries for community fund provision to reflect visual impacts derived from topography. Topography is not subjective or interpretive it is derived from the material shape of the landscapes in which infrastructures are sited. Data on topography is likely already collected as part of grid planning and consent submissions. We advocate considering this data when assessing eligibility for community benefits and bill discounts. Planning data on visual impacts could be used to identify properties affected, and topography could also provide a rationale for allowing individuals to opt into the scheme.

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¹ Devine-Wright, P. and Sherry-Brennan, F., 2017. EirGrid Pilot Community Fund Evaluation Report.

² Devine-Wright, P. and Sherry-Brennan, F., 2019. Where do you draw the line? Legitimacy and fairness in constructing community benefit fund boundaries for energy infrastructure projects.

Ensuring the opt-in process is fair

- We support the principle of allowing individuals and communities to opt into the bill
 discount scheme. However, for this approach to be effective and fair, participants must
 have the capacity and awareness to engage with the process in an equitable manner.
 Levelling the playing field through capacity-building measures will be essential to
 ensure that all eligible communities, including hard-to-reach groups, can participate.
- Part of this effort should include raising awareness of the scheme and its benefits, and making the opt-in process widely known and accessible. Fairness must be at the heart of grid transformation, and clear plans for engaging and supporting hard-to-reach communities should be communicated.
- We also suggest considering an opt-in route for hospitality and tourism businesses or other non-domestic stakeholders (e.g. cafes, hotels) who may feel visually or socially impacted by the infrastructure, as this would extend the scheme's benefits to those whose livelihoods are directly affected.
- Suppliers are well placed to administer the scheme, but there should be robust, independent monitoring to ensure the process is delivered consistently and equitably over time, ensuring public trust in its findings.

Transparent justifications for the proposed approach

- We note that the consultation proposes providing bill discounts for a period of 10 years. However, we have not been able to find any rationale for selecting this specific timeframe. We would welcome the publication of a clear, objective rationale for why the scheme is limited to 10 years rather than extending for the full operational life of the relevant infrastructure. Transparent justification is important, as communities may raise questions about the scheme's duration in the future and ask why it differs from other energy infrastructures that continue for a longer period (e.g. for the operational life of a wind farm).
- Similarly, we believe that the reasoning behind the proposed monetary value of the bill discount and the 500m distance threshold should be communicated more transparently. While we were able to identify some of this information in an Appendix to the Planning and Infrastructure Bill, it is not easily accessible nor clearly explained. Making these justifications more transparent would help ensure that affected communities understand how the scheme has been designed and the rationale for key parameters. This is also likely to improve its legitimacy and wider acceptance as a mechanism for energy system change funded across consumers.