

Regional Energy Strategic Plan policy framework consultation– Response from the Royal Society of the Protection of Birds

Q1. What are your views on the principles (in paragraph 2.8) to guide NESO's approach to developing the RESP methodology?

It is critical that measures to address the climate crisis such as through facilitating renewable energy developments, do not exacerbate the nature crisis. We therefore think that the principles should also explicitly set out that the methodology will be 'nature friendly/nature positive/nature safe' – i.e. it will ensure that high priority is given to environmental protection. This would fit into the first bullet point. Given the urgency of the nature and ecological crisis, and the degree to which 'place-based' is open to interpretation, we would like to see under the first bullet point a reference to a nature positive approach, or to a place-based approach that follows the mitigation hierarchy for nature.

Aside from this crucial addition, we agree with the principles.

Q2. Do you agree that the RESP should include a long-term regional vision, alongside a series of short-term and long-term directive net zero pathways? Please provide your reasoning.

Having a RESP set out a longer term non-binding vision for energy within a locality could be helpful and inform the local planning process, however the credibility of the RESP will depend on what level of examination and scrutiny it will have and how transparent it is. The RESP also needs to have regard to relevant environmental strategies, including Local Nature Recovery Plans (in England) and equivalents.

Q3 – Q6.

No response.

Q7. Do you agree with the framework of standard data inputs for the RESP? Please provide your reasoning.

No, we do not agree. There is nothing on the list that we disagree with – but there are several significant omissions from the list. While these will not help to form a picture of energy demand, they will be an important part of guiding the most appropriate places at which to deliver supply. These include maps of designated sites of scientific and ecological importance held by Natural England, Nature Scot, and Natural Resources Wales (Other sources), Local Nature Recovery Plans (Local Government Data), National Nature Reserves (Other sources), Local Nature Reserves (Local Government Data) and the forthcoming Natural England peat map, the existing Peatlands of Wales Map and the 2016 map of peat soils and their carbon value in Scotland (Other sources). There are likely to be other important inputs from the national statutory nature bodies so we strongly encourage Ofgem and NESO to seek their input directly. We would also recommend including maps of Wildlife Trust, RSPB and National Trust reserves.

Q8. Do you have any suggestions for criteria to assess the credibility of the inputs to the RESP?

No response.

Q9. Do you agree with the framework for local actor support? Please provide your reasoning.

While we agree with the framework for regional spokes, the proposal for how the 'Central Hub' should put together the methodology, assumptions, digital tools, data etc, is underdeveloped.

Further consideration should be given to which stakeholders the Central Hub will involve (including how nature statutory bodies and environmental NGOs can participate in this) in the development of the methodology, and how local authority perspectives might feed into the development of that methodology.

Q10. Do you agree with the purpose of the Strategic Board? Please provide your reasoning.

No response.

Q11. Do you agree that the Strategic Board should include representation from relevant democratic actors, network companies and wider cross-sector actors in each region?

The Strategic Board should include representatives of Natural England, Nature Scot or Natural Resources Wales (as appropriate for each region) – this should be explicitly expressed in the framework as ‘wider cross-sector actors’ is highly subjective. Including these stakeholders will help to ensure that the RESP meets its legal environmental responsibilities under legislation such as the Environment Act 2021 and the Well-being of Future Generations Act 2015.

If these organisations are not able to provide a representative, then the Board should identify a representative from an environmental organisation such as the Royal Society for the Protection of Birds or the National Trust.

We also consider it important that a wider range of environmental organisations have the opportunity to feed into the RESP development process from the outset of the plan.

We also note that there is a risk that only involving ‘upper tier local authorities’ could spark tensions between local authorities, and that some upper tier authorities are not planning authorities, so it may be more appropriate in some instances for lower tier authorities to be involved. Aside from this, we agree with the representatives proposed for the Strategic Board.

Q12. How should actors (democratic, network, cross-sector) be best represented on the board? Please provide your reasoning, referring to each in turn.

As noted above, the Strategic Board should include representatives of Natural England, Nature Scot or Natural Resources Wales (as appropriate for each region) – this should be explicitly expressed in the framework as ‘wider cross-sector actors’ is highly subjective. Including these stakeholders will help to ensure that the RESP meets its legal environmental responsibilities under legislation such as the Environment Act 2021 and the Well-being of Future Generations Act 2015.

If these organisations are not able to provide a representative, then the Board should identify a representative from an environmental organisation such as the Royal Society for the Protection of Birds or the National Trust.

We also consider it important that a wider range of environmental organisations have the opportunity to feed into the RESP development process from the outset of the plan. As set out in the answer to the preceding question, there is a risk that only involving ‘upper tier local authorities’ could spark tensions between local authorities, and that some upper tier authorities are not planning authorities, so it may be more appropriate in some instances for lower tier authorities to be involved. Aside from this, we agree with the representatives proposed for the Strategic Board.