

Transitional Regional Energy Strategic Plan Response:

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About the Consultation:

The [National Energy System Operator \(NESO\)](#) are consulting on their transitional Regional Energy Strategic Plan (tRESP); a key step in planning how energy infrastructure will evolve to meet Scotland's future energy needs.

This consultation is especially important for Development Trusts because it will influence where and how investment happens in local energy infrastructure - from rural grid connections to renewable generation, battery storage, heat, and other decarbonisation projects.

DTAS wants to ensure that communities can deliver and benefit from local energy initiatives for years to come. Our response reflects key issues around community ownership, fair access to the grid, and support for rural and island areas. We have focused our response to the areas we see as most impactful to our members.

About DTAS:

Development Trusts Association Scotland (DTAS) is a member-led organisation that provides direct support and advice to community organisations across Scotland. DTAS represents almost 400 development trusts covering 31 out of 32 local authorities across Scotland. Development Trusts are community-owned and led, place-based and enterprising community anchor organisations.

Our Community Ownership Support Service has provided support to hundreds of communities across Scotland taking assets into community ownership. Our Democratic Finance Scotland team focuses on promoting citizen investment and harnessing community-led opportunities in renewable energy.

DTAS is also a member of the Scottish Community Coalition on Energy (alongside Community Energy Scotland and Community Land Scotland) which seeks to secure a Fair Energy Deal for Scottish communities. The group is advocating to maximise the positive impacts of the renewables revolution by creating more opportunities for community-owned energy and putting Community Wealth Building principles at the heart of wider energy policy and economic transformation.

This consultation response is based on the extensive experience of DTAS supporting and lobbying on behalf of our members involved in community energy, shared ownership, and those facing energy pressures in their communities. To inform this response we also conducted a detailed survey of our members, receiving 24 responses from community organisations based across the country. The organisations surveyed are deeply embedded in their local contexts and have decades of experience representing their communities and responding to unmet and urgent needs.

Additionally, many of them are delivering community energy projects or have shared ownership arrangements.

Nations and Regions Contexts:

The Nations and Regions Contexts are the first of four key components of transitional Regional Energy Strategic Planning (tRESP), alongside Pathways, Consistent Planning Assumptions (CPAs), and Strategic Investment Need (SI Need). They map and reflect an initial view of national and regional conditions and priorities, highlighting key challenges and opportunities across each RESP nation and region. The Nations and Regions Contexts support strategic energy planning through providing a view across key themes and topics, in a consistent and comparative way, providing insights and narrative supported by quantitative data.

Q1: Are the Nations and Regions Contexts accessible, clear and easy to interpret? What improvements would you like to see?

The Nations and Regions Context for Scotland largely present a realistic view of the energy landscape and reflects many of the common energy pressures faced by communities.

However, there are many areas that need to be expanded upon or are entirely missing from the contexts, these are detailed in our response to question 3 and include:

- Community energy and shared ownership
- Fuel poverty challenges
- Local opposition to infrastructure
- Key Scottish government targets
- Impact of planned projects on communities
- Rural and Island challenges and energy pressures

Q2. How well do the Nations and Regions Contexts reflect your understanding of your nation or region?

Multiple choice: Moderately Well.

Q3. Do you agree with the elements and topics included in the Nations and Regions Context and is there anything missing that you would have expected to see?

The Nations and Regions Context for Scotland reflect some of the common energy pressures faced by communities and largely presents a realistic view of the energy landscape. We specifically support the inclusion of the core challenges that many

DTAS members report facing in their communities: depopulation, heat networks, electric vehicle infrastructure, and energy and fuel poverty.

However, some key challenges are either not reflected in these contexts or should be expanded upon:

- While we support the discussion of fuel poverty across Scotland, there should be a more detailed breakdown identifying where rates are especially high and where households are falling into ‘extreme fuel poverty’. Within this, there should also be recognition that these areas - experiencing some of the highest fuel poverty rates - are also host to a large share of planned and ongoing net zero infrastructure such as wind farms, battery storage, and associated transmission and distribution systems. As highlighted in our response to Question 20, these areas must also be identified as priorities for strategic investment.
- **Under Section 6: Targets**, we call for the inclusion of the **Scottish Government’s target for 2GW of local and community-owned energy by 2030**. This should be accompanied by the clarification that ‘locally owned’ energy is not always community-owned - DTAS and CES consider community energy to be that owned by community organisations.
- **Section 5: Electricity Generation and Storage** notes that most planned infrastructure for Scotland and the wider UK will be hosted in the Highlands, North Coast, Northeast, and Borders regions. Communities hosting these developments are, at present, the least likely to benefit from them and face challenges such as higher-than-average energy costs - particularly in the Highlands and Islands, but also in other remote rural areas. Including this fact, and linking it to the challenge of fuel poverty, would provide a more accurate reflection of the realities faced by these communities.
- **Section 5: Electricity Generation and Storage** also highlights areas where planned generation and operational storage capacity is concentrated. Loch Ness is identified as a key area for operational storage capacity, yet there is no mention of the potential impact this will have on residents and communities - especially given the area’s reliance on tourism. More detail on how this storage capacity will be expanded and what the local impacts are would be useful.
- In the section on **Transport and Heating**, there should be further detail on the need to upgrade housing stock that is not energy efficient, including mention of where upgrades are restricted by planning or other barriers. There should also be reference to how energy efficiency will be supported - for example, through increased grant funding and targeted subsidies for insulation, particularly for older housing stock and community buildings.

- **Shared ownership is entirely missing from the nations and regions context.** Many community organisations already have, or are looking to enter, shared ownership arrangements within upcoming renewable energy developments. There should be mention of this ambition and of the positive impacts it can bring, such as more meaningful community benefits, stronger local acceptance, and increased local acceptance of these projects.
- Information on the **lack of three phase electricity in much of West coast, Islands and rural Scotland is lacking from the nations and regions contexts.** Most of these areas are not served with three phase electricity, significantly impacting large scale businesses. Single phase electricity is prohibitively expensive to upgrade and significantly contains the expansion of electric vehicle charging infrastructure. Building three phase capacity in rural, island and coastal Scotland would be transformative in terms of enterprise creation and EV transition.
- **Repowering opportunities will be central to the renewable energy landscape and is not mentioned in the contexts.** According to data by CES by 2035, 52MW of community-owned wind will have needed to be repowered. That is 61% of current community-owned wind in Scotland. All (current) community-owned wind in Scotland will need repowered by 2038¹. Community groups need support to retain this energy in community hands. Otherwise, there is a real and significant risk of losing community input and control in the energy transition and not meeting necessary community energy and net-zero targets.

We would also like to reflect that, through the DTAS consultation survey with development trusts, many organisations reported a growing anti-windfarm or anti-renewable energy sentiment. While DTAS and many of our members support renewable energy infrastructure, these anti-development sentiments often arise in areas with high levels of planned or ongoing development - areas which also face core energy pressures such as above-average energy costs, lack of provision, and frequent power outages. This issue has become increasingly polarised, and local opposition can only be addressed when projects deliver tangible, local benefits through community ownership, clear planning processes, transparent decision-making, and collaborative governance.

We also support Community Energy Scotland's Response, where they call for:

- Statistics on community owned energy.
- Information on the amount of electricity that needs to be curtailed annually.

¹ <https://communityenergy.scot/wp-content/uploads/2025/02/Community-Power-Presentations.pdf>

- Statistics on how many homes will be able to decarbonise through heat pumps, and details on other solutions that will be required i.e. heat networks.

4. How do you envisage using the Nations and Regions Context(s)?

DTAS will be using this information to lobby for continued investment and improvements to community energy in Scotland. Highlighting community need, impact, and delivering will however require stronger community engagement on an ongoing basis. This information should form the basis of a much wider effort to engage more widely with communities for planned infrastructure improvements. Not only do communities need to understand and be consulted on for future energy planning, but more than that, they need to directly benefit from this work.

7. What additional data do you think we should be considering either for tRESP or full RESP?

Further to our response to questions 1 and 3 the below data should be expanded upon and included in the tRESP and RESP:

- Data on **community-owned energy and shared ownership** projects, including scale, type, and community benefit outcomes.
- Information on **local and community-owned energy capacity** in relation to the Scottish Government's **2GW by 2030 target**.
- Analysis of **energy costs and access** in areas hosting major infrastructure (particularly Highlands, Islands, and other remote regions).
- Assessment of **local socio-economic and environmental impacts** of large-scale energy and storage developments (e.g., around Loch Ness and other tourism-dependent areas and remote rural and island areas).
- Data on **housing energy efficiency**, including upgrade potential, planning restrictions, and gaps in **grant or subsidy provision** for community and older buildings.
- Evidence on **community sentiment and attitudes** toward renewable developments, particularly in areas with high infrastructure concentration.
- Information on **repowering pipeline** to allow communities to be involved and active in repowering opportunities in their area. This information, communicated in an accessible way, would allow communities for plenty of time to plan and raise finance. Communities need to be on an equal playing field with the information provided. It is also important to understand any constraints that might make community involvement in these projects unattractive to large developers.

Strategic Investment Need (SI Need):

This consultation sets out NESOs emerging view of SI Need as part of the tRESP process. It includes draft narratives, hotspot examples, and spatial illustrations intended to test their developing approach and gather feedback that will inform both the final Q1 tRESP outputs and our full RESP framework.

15. Do you feel that the definition and framing of Strategic Investment Need (SI Need) is clear?

Somewhat agree.

The definition is clear but could be improved by:

- Stating exactly how the grid connections queue will feed the final SI Need map
- A published scoring matrix would be helpful for understanding the weightings and how priority is calculated and the move between the groupings

16. Are the emerging SI Need areas broadly aligned with the approach and framework we have set out, including the use of Strategic Value and Uncertainty as assessment criteria?

Somewhat agree.

The distinct differences between urban, rural and island areas in Scotland is starting to be captured as they all have varying needs in the pipeline but also in the way that they can benefit. There needs to be a clear emphasis and explanation of how smaller social value developments will be prioritised; to avoid these developments getting overshadowed by larger scale developments which deliver more on profit.

DTAS welcomes the In Development Register, to enable clearer communications with communities and hopefully provide a way to address the gaps in evidence of need. Communities should also be proactively and directly engaged with to assist in providing evidence of need where possible.

17. Does the combination of RESP area narratives, maps and hotspot descriptions provide a clear and helpful picture of where emerging needs are arising? Is the level of detail suitable for your purposes?

Mostly, with a few additions:

- **Islands & rurality lenses:** Provide “small multiples” for island groups (Orkney, Shetland, Western Isles) and remote mainland to avoid the islands visually shrinking off the map/priorities. The hotspot narratives should also include island-specific resilience signals (such as storage, ferry logistics).

- **Readiness:** Can this be tied in to CARES pipeline applications, DTAS members/other community anchors need and demands evidence
- Link the hotspot areas to the Group1-3 categories

18. What level of geographic detail would be most useful in future versions? For example:

- o Local authority boundaries
- o Project-level details
- o Place-based clusters or zones
- o GSP (Grid Supply Point) boundaries
- o Thematic areas (e.g. heat networks, industrial clusters)
- o Lower layer super output area / data zone

All of them.

19. Do you see a role for these outputs in supporting local planning, infrastructure alignment, investment proposals?

Yes. RESP outputs, particularly areas identified as strategic investments should inform grid connection decisions and overlay fuel poverty information with RESP hotspots to steer investment to communities that have most social need. We need to not focus on financial gain only and keep the social and environmental impact as the driving force.

RESP should make clear how it will link with the SSEP. Through our participation in the Scottish Community Coalition on Energy we are calling for [community energy projects to be given priority in the grid connection queue](#), through community energy designation and/or a project-by-project derogation from certain requirements, like posting securities. Designation would require criteria to be added to the Connections Network Design Methodology (CNDM) for ‘designating’ community-owned energy and storage projects as ‘needed’ for the Strategic Spatial Energy Plan. Those community-owned projects could be included and prioritised within the reformed connections queue.

20. Are there any locations you would expect to see identified as SI Need that are not currently being assessed? Please highlight these and, where possible, provide supporting information.

We acknowledge the unique challenges faced by island communities and support their specific inclusion and mention in tRESP as areas in need of priority investment. We also urge consideration of remote rural areas in Scotland as areas for priority investment. In

our consultation with DTAS members we received a high number of responses from the Highlands reflecting common energy challenges:

- **Over-concentration of Energy Infrastructure:** significant clustering of energy developments, including several existing onshore windfarms, multiple consented sites, and further applications for new onshore windfarms. There are also multiple Battery Energy Storage System applications, many speculative and uncoordinated, with developers often unaware of neighbouring proposals.
- **Grid and Infrastructure Pressures and Reliability:** Major transmission infrastructure will cause significant disruption to communities. Grid capacity limitations and weather-related power outages are common, and areas remain highly vulnerable to supply interruptions. Seasonal tourism adds pressure to already stretched local energy networks.
- **Fuel Poverty and High Energy Costs:** Sutherland and other parts of the Highlands experience some of the highest levels of fuel poverty in the UK. Many households, businesses, and community facilities depend on oil/wood for heating due to the absence of mains gas and limited renewable alternatives. Poor insulation especially in older and listed buildings worsen the problem.
- **Limited Community Involvement:** local communities have limited control or benefit from the generation occurring around them. This has led to concerns over the cumulative impact of energy infrastructure, and contributed to increasing anti-windfarm sentiment, particularly as local energy costs continue to rise.

Sutherland in the Highlands is specifically highlighted as an area for priority investment in our survey of DTAS members. Sutherland is identified in the nations and regions context for Scotland as a key area for planned generation capacity, with Sutherland North and West, Sutherland South, and Sutherland East having a combined planned generation capacity of 1,700 MW. With only 0.02% of the UK's population Sutherland is producing 2.6% of the UK's electricity from onshore wind² - a figure that will only increase with time. At the same time, Sutherland faces some of the highest levels of fuel poverty in the country, while much of its locally generated energy is exported. Most of Sutherland's households and businesses are not connected to the main gas distribution network and therefore face much higher costs, fragility, and discontinuity of supply.

We also support Community Energy Scotland's response, particularly:

² <https://www.northern-times.co.uk/news/fuel-poverty-in-sutherland-highlighted-to-energy-minister-318214/>

- Including Applecross in the Highlands as an area for SI need. Applecross is a grid-constrained, rural community supplied solely by single-phase electricity, which is prohibitively expensive to upgrade. This imposes energy restrictions which directly impact the community, hindering business development, limiting locally generated energy exports, and restricting EV charging capabilities.
- Assessing and including East Lothian for SI need. The area has potential for heat network utilising industrial waste, heating around 100,000 in total homes across East Lothian and in Edinburgh and Midlothian, meeting up to 300MW of peak transmission demand in total, and addressing grid constraint issues. See CES response for more detail. More information is available here:
<https://sustainingdunbar.org/files/2025/07/East-Lothian-Heat-Report-Web.pdf>