



BEFS RESPONSE: REGIONAL ENERGY STRATEGIC PLANNING METHODOLOGY CONSULTATION

Built Environment Forum Scotland (BEFS) is an umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's existing built environment.

This is a response from BEFS to selected questions in the National Energy System Operator's 2025/26 [consultation on Regional Energy Strategic Planning methodology](#). There are 11 Regional Energy Strategic Plans in the UK, including one in Scotland, which are designed to support a joined-up approach to energy planning and progress towards Net Zero. The methodology, intended for introduction in summer 2026 subject to regulatory approval, supports technical coordination, stakeholder engagement, data sharing and social impacts.

Other relevant consultation responses from BEFS can be seen below, as many issues overlap and demand associative consideration:

- [Climate Change Plan Scrutiny \(Sep 2025\)](#)
- [Strategic Guidance on Climate Change Duties for Public Bodies \(May 2025\)](#)
- [Community Benefits from Net Zero Energy Developments \(April 2025\)](#)
- [Delivering Net Zero for Scotland's Buildings - Heat in Buildings Bill \(March 2024\)](#)
- [Draft Energy Strategy and Just Transition Plan \(May 2023\)](#)

Do you agree with the approach we have outlined on local actor support, and how we have phased the delivery? Please provide your reasoning.

Yes. The purpose of stakeholder and community engagement is well-described and will help ensure the Regional Energy Strategic Plans (RESPs) are transparent, accountable, representative and coordinated as required by regulatory frameworks.

The identified partners, customers and other stakeholders the 11 RESPs will engage with appear logical and appropriate. The development of new outreach channels to complement new ones will be helpful in managing the practicality of liaising with a wide network of external stakeholders.

One general challenge BEFS Members have identified with regard to well-intentioned public sector community engagement strategies is a risk of tokenism. BEFS Members report that despite reassuring rhetoric to the contrary by public agencies, what is often labelled community consultation, involvement, participation, collaboration and empowerment, is in reality information-sharing from a public body to community groups.

BEFS regularly hears concerns that communities do not factor into many consultations in a meaningful way, and that the views expressed by communities show little alignment with the outcomes of internal decision-making processes.

The RESP methodology has demarcated the “tell”, “ask, listen and consider” and “work with” types of engagement thoughtfully, and the challenge will be turning this into a reality in practice. BEFS supports the good practice as set out in guidance such as the [National Standards for Community Engagement in Scotland](#), which could be reviewed and followed to help ensure actions and outcomes line up with good intentions.

For the purposes of the RESP methodology, BEFS will qualify as a relevant stakeholder in the “Local actors” category; our Scotland-wide remit covers a single RESP region, and we have specific interests in spatial planning, community interests, and the strong linkages between the energy sector, the built environment and Net Zero. As such, BEFS would be willing to participate in any mutually useful engagement opportunities, where appropriate.

Do you agree with our proposed design for working groups? If not, what changes would you propose and why?

BEFS is a keen proponent of working groups, and we manage four Scotland-wide forums in the course of our regular activities programme:

- [Conservation Officers Group](#)
- [Historic Environment Working Group](#)
- [Places of Worship Forum](#)
- [Scottish Parliamentary Tenement Maintenance Working Group](#) (BEFS shares co-secretariat duties with the charity Under One Roof)

BEFS working groups are effective channels for cross-sector learning, exchanging, networking, discussing emerging impacts of policy and practice developments, and informing wider policy and strategy. We expect the thematic working groups identified in the RESP methodology will play a strong role in guiding priorities, providing valuable feedback on what is working well and what isn't, and assisting with challenges, gaps and inconsistencies.

BEFS has a particular interest in the Local Government Working Group for Scotland, which has some parallels with the Conservation Officers Group that BEFS

facilitates, which draws Members from heritage, planning and conservation roles in Scotland's 34 planning authorities.

There may be strong mutual value in a Conservation Officers Group representative joining, participating or providing occasional feedback to the Local Government Working Group for Scotland. A connective arrangement could help ensure built environment interests and opportunities are effectively represented in the Local Government Working Group for Scotland.

BEFS would welcome a conversation with the National Energy Systems Operation should it wish to explore the prospects of an arrangement.

Do you agree with our proposed approach for the Spatial Context? Please provide your reasoning.

Yes. BEFS has been consulting with its Members and stakeholders towards the production of a [2026 Manifesto: Building Foundations for a Better Scotland](#). The Manifesto, which is designed to inform elections to the Scottish Parliament in May 2026, features a dedicated 'data and research' section and linked policy recommendations.

BEFS argues in its Manifesto that a major built and historic environment policy priority should focus on improving the quality and quantity of useful information on the existing built environment. There are many examples of missing or poor quality records and information, and unmet research demands.

The Spatial Context plans to provide a place-based digital mapping platform centred on energy system needs and plans and geographic assets, will therefore be welcomed by the BEFS network. While BEFS is not able to comment on the technical options and context for electricity, hydrogen and other energy needs, the provision of additional spatial information on energy developments and plans will help the wider built environment sector in Scotland.

BEFS notes the RESP methodology consultation paper mentions Local Heat and Energy Efficient Strategies (LHEES) as one of the data sources that will be used to synthesise a full picture of energy need and mapping in Scotland. BEFS Members have expressed a keen interest in learning more about LHEES in practice, particularly with consideration to [draft Scottish Government legislation planned to support the decarbonation of heat in buildings](#). BEFS has a particular interest in accessing and working with LHEES data to learn more about energy plans designed to benefit traditionally constructed buildings.

With regard to Hydrogen, BEFS regularly liaises with the Improvement Service, which manages the National Planning Improvement Hub on behalf of the Scottish Government. The Hub helps planning authorities to meet their obligations and undertake improvement plans. In 2025, this has included the Hub learning about and mapping the specialist skills that planning authorities need, but don't yet have good access to, including in the realms of hydrogen and battery energy storage.

The Hub is also working behind the scenes to support the development of a new generation of Local Development Plans in Scotland, which will have implications

for future energy developments. BEFS would suggest exploration of the National Planning Improvement Hub's potential to contribute to the Spatial Context and thematic working groups in Scotland.

What examples of whole system optimisation opportunities are you aware of and what considerations should we take to identify, prioritise and develop these collaboratively with you?

BEFS welcomes the prominence of whole system thinking in the RESP methodology.

On behalf of its diverse Members and stakeholders, who care for, celebrate and promote the value of Scotland's historic buildings, public spaces and infrastructure, the 2026 BEFS Manifesto calls on policy-makers to create the conditions for a well-resourced, dynamic and effective built and historic environment sector.

BEFS believes this will deliver strong value for public money as preventative spend, delivering substantial progress as part of a holistic, whole system approach across multiple public policy portfolios, from environmental sustainability, skills and economic development to housing, poverty and health.

Scotland has pressing challenges and varying economic disparities across its urban and rural settlements. The BEFS Manifesto features 15 practical policy recommendations to address these, including:

- Take a holistic approach to existing and new climate emergency legislation; ensuring wider policy alignment, and consistent cross-party support beyond parliamentary cycles;
- Establish a Ministerial Oversight Group on Retrofit in Scotland, to devise and deliver a Retrofit Delivery Plan;
- Commit to investment in, and enabling pathways to, bring vacant and derelict land and buildings back into use at scale;
- Scale up built environment and heritage investment programmes, leveraging value across portfolios;
- Invest in a national programme for training delivery across a variety of traditional building and wider construction skills.

Full background and further detail on each policy recommendation is available in the full Manifesto, [available on the BEFS website](#).

Ultimately, the investments called for in the BEFS Manifesto will help build a better Scotland by reversing decline and improving quality of life across all of our places. BEFS is confident that taking forward these policy recommendations will set the foundations for enhancing and maintaining Scotland's built environment in the longer term.

BEFS welcomes the National Energy System Operator's expressed appetite for collaborative development on whole system approaches, and will be willing to discuss any practical opportunities for coordination and exchanging.

BEFS responses to a number of consultations in relation to the Built Environment can be found at: <https://www.befs.org.uk/resources/consultations/>

RESPONDENT INFORMATION

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BEFS gives consent to the National Energy System Operator to publish the consultation with name, to share the response internally, and to contact BEFS in future in relation to this consultation exercise.

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