

Stakeholder Justification Paper – Biodiversity	
Output/Commitment Title	Help our business and partners to meet national biodiversity objectives. This could involve offering use of our land to community groups.
Detail	We will collaborate with not-for-profit community organisations to manage unused or redundant land as green spaces, fostering nature recovery and biodiversity. Our commitment includes supporting two major partnership projects and at least three smaller ones. This is over and above our biodiversity net gain obligations. While we will prioritise our own land, in the event that non suitable is available in the price control, we will support projects on land we don't own subject to it/the project meeting criteria.
Strategy Document/ Business Plan Section	Climate Resilience Strategy – Environmental Action Plan – BP: Environmental Strategy – BP: Climate Resilience Strategy
Cost & Bill Impact	
Proposed Funding	Base
Benefits & risks	
Summary of benefits	<p>Community groups will benefit from opportunities to learn, support nature, grow food and improve individuals' wellbeing.</p> <p>Direct financial benefits: potential but not confirmed – biodiversity credits trading in future depending on legislation and market details – could be of financial use to us if we own the land.</p> <p>Societal benefits: cleaner air, food growing, educational resource, “green prescribing” by medical profession</p>
Summary of risks	We may have to spend more to achieve our biodiversity net gain obligations due to lack of less costly options.
Stakeholder voice - Golden thread	
Engagement method (what and who)	<p>Method: We utilised a wide variety of engagement methods to gather insight, these included: Online Workshops, In-Person Workshops, Roundtable Discussions, Stakeholder Advisory Panels, Follow-Up Meetings, Interactive Workshops and Stakeholder Surveys. We made use of our Citizens Panel as well as our Social Media channels to collect feedback. We worked on consultations alongside Local Authorities and engaged at a regional level through topic specific workshops. We also undertook research.</p> <p>Stakeholders: A diverse range of stakeholders were engaged with to gain insight around biodiversity, these include Local Nature Partnerships, Wildlife Trusts, National Trust, the general public, environmental groups, business representatives, vulnerability groups, and charity organisations. A range of Local authorities consisting of local authority officers, local nature recovery strategy planners, Local Enterprise Partnerships (LEPs), and local councils such as Somerset Council. Some specific organisations and networks involved were Wales Biodiversity Partnership, Welsh Government, UK Government, National Park Authorities, Forestry Commission, Citizens Advice, Welsh Council for Voluntary Action, Care & Repair Cymru, Warm Wales, Fuel Bank Foundation, Community Forest, National Energy Action (NEA), Buglife (B-lines project), Plantlife, RSPB Cymru (Royal Society for the Protection of Birds), and CIEEM (Chartered Institute of Ecology and Environmental Management); and the individuals and their roles include Tim Birch (Wildlife Trusts Wales), Laura Coleman (Plantlife), Rachel Richards (Buglife), Karen Whitfield (Wales Environment Link), Gareth Ludkin (Campaign for National Parks), Shaun Gaffey (RSPB Cymru), and Mandy Marsh (CIEEM). We engaged with academic and research institutions as well as local emergency services and housing associations.</p>

Stakeholder Views (what they said, regional differences and how we responded)

Opinions, views: Energy Networks & Research Institutions emphasise the importance of collaboration and expertise in biodiversity initiatives. Energy networks highlight the need for regional action and collaboration with local authorities and other stakeholders to achieve biodiversity and environmental net gain, stressing the importance of clear, measurable goals and specific milestones in biodiversity plans. Meanwhile, research institutions underscore the necessity of scientific expertise and collaboration, emphasising data-driven processes and strategic planning for effective environmental management.

Local Authorities emphasise the importance of early communication and collaboration with communities and conservation groups for tree planting and removal activities. They also stress the need for comprehensive biodiversity surveys to protect sensitive habitats and species. Local authorities support integrating local nature recovery strategies with WWU's land management processes, particularly in highway projects. They also see collaboration on land management as an opportunity to deliver social value, especially through support for community and climate action groups and communication campaigns on fuel poverty and energy awareness.

Charities & Business Representatives both stress the importance of effective messaging to articulate the value of biodiversity actions, especially in the context of rising bills and associated costs to consumers. Charities also expressed a willingness to collaborate with WWU to spread actions to rural areas and assist with local initiatives.

Vulnerable Customers highlighted potential social benefits of biodiversity initiatives and suggested collaborations with town councils to achieve these.

Nature Conservation Organisations are eager to collaborate with WWU on biodiversity initiatives, such as site management, biodiversity action advice, public communications, and sharing metrics and methods for measuring biodiversity benefits. Proposed collaborations include developing a biodiversity grant scheme for local partners and providing private investment into government schemes that benefit biodiversity.

Overall, stakeholders broadly support WWU's biodiversity initiatives but stress the need for clear communication, strategic partnerships, and comprehensive surveys to ensure the success and long-term impact of these efforts.

Conflicts: There is a clear conflict of opinions around the use of the Biodiversity Net Gain (BNG) Metric, especially with local authorities, as despite its clear guidance, it is not the metric used in Wales. In Wales, the biodiversity net gain regime is termed "Net Benefit for Biodiversity" (NBB). While it has a similar intent to Biodiversity Net Gain (BNG) in England in delivering an overall improvement in biodiversity, NBB does not use a metric-based approach like BNG, which sets a baseline number of biodiversity units and requires developers to improve biodiversity by a minimum of 10%.

NBB supports a proactive approach to be taken by developers to biodiversity, wider ecosystem benefits, and resilience at the design stage. NBB applies to all development in Wales, even in cases where biodiversity value is being maintained rather than enhanced.

Regional differences: In Wales, there is a preference for the Net Benefit for Biodiversity approach, which is considered more holistic but less clear in its guidance. The BNG metric seems to be more widely accepted and utilised in England due to its clear metrics and guidance.

Options considered: When developing this commitment, we considered the following options

	<p>1 - Do nothing further than what is being done in GD2 and continue to lease two sites being developed as green spaces on our property. This would be in addition to any mandatory biodiversity net gain requirements on work with planning consent.</p> <p>2 - Work with partners to enable nature recovery and biodiversity gain on their sites, committing to support two main partnership projects and at least three minor projects. Consider leasing other appropriate sites during the period 2026-2031. This would be in addition to any mandatory biodiversity net gain requirements on work with planning consent.</p> <p>3 – Commit to support three main partnerships and up to 10 minor projects and transfer suitable safe assets to local communities for biodiversity net gain activities.</p> <p>How we responded: Weighing up the cost to consumers, our obligations and our desire to be proactive company in relation to emissions reduction, biodiversity and sustainability we have opted to go with option 2. This will allow us to pursue new partnerships, improving the biodiversity and social return of our sites but balanced against the associated costs to consumers. It is also the least risky option as asset transfer of former gas sites would be legally complicated and subject to stringent assessment of the safety level at these sites. Our Business Plan Acceptability Research (1,251 online and 150 in person 20-minute interviews) tested the acceptability of this commitment with domestic and SME consumers and resulted in 92% of participants finding this commitment to be acceptable.</p>
Performance	
<p>GD2 Performance, Benchmarking/ Industry comparison</p>	<p>In GD2 we did not have a systematic or strategic approach to supporting biodiversity through partnership. In the GD3 price control we will carefully select the projects we support, aiming to achieve optimum social and environmental benefit. We will concurrently be researching the emerging biodiversity credits market and aiming to make links with that as appropriate but our primary motivation will be to report evidence of biodiversity/environmental/social benefit achieved as a consequence of our support.</p>
Deliverability & Whole Systems Impact	
<p>Deliverability & viability implications</p>	<p>As members of the UK Business Biodiversity Forum, we will structure our support on best practice guidance. Supported projects on either our land or that owned by others will need to have a detailed long-term management plan maintained and implemented by a constituted group meeting good governance criteria. Projects will need to have a mechanism for measuring biodiversity gain and/or net benefit through ecosystem service enhancements. We will need assurance that locations are not likely to be sold or developed. These criteria favour designated sites, sites owned by wildlife trusts, national parks, trusts or non-profit social enterprises, community or town councils.</p> <p>We have one existing example – Cambrian Place leased to Haverfordwest Town Council – that provides precedence. We have established a connection with Wales Environment Link and will look to develop that and something similar for England. We will consider using these partners as steering/assurance providers for our plans.</p>

Triangulation scorecard

Our engagement scoring methodology leverages the information from the HM Treasury’s Magenta Book, Quality in Qualitative Evaluation framework and various weighing methodologies used by networks to assess how much impact each piece of evidence should have on their decision-making process.

Each piece of evidence is given a score between 0-2 against a scoring criteria including *Relevance to topic*, *Level of stakeholder knowledge*, *Quality of engagement*, *Rigour of feedback collection* and *Credibility of analysis and interpretation*.

The table below outlines how the evidence used to produce this document scored against each criteria and its overall score. An average and modal score is then provided, which is associated to a grading system that demonstrates the feedback robustness and quality.

Document Name	Score					Final Score
	Relevance to Topic	Level of Stakeholder Knowledge	Quality of Engagement	Rigour of Feedback Collection	Credibility of Analysis and Interpretation	
2023-The-Trussell-Trust-Hunger-in-the-UK-report-web-updated-10Aug23	0	2	2	2	2	8
_NESO engagement event	1	2	2	1	2	8
Powering Up Britain announcements	1	2	2	2	2	9
11920 CR Plus SWIC Cluster Report	2	2	2	2	2	10
20230213 - HJ - HyCymru and Wales Hydrogen Infrastructure Group	0	2	2	1	2	7
20240605_Draft Technical Report_Denbighshire	2	2	2	2	2	10
20240617_LAEPTechnical_Report_Wrexham	2	2	2	2	2	10
220209 DAR St. Athan Hydrogen Aviation Cluster Workshop	0	2	2	1	2	7
220722 DAR NIC and Bristol City Council	0	2	2	1	2	7
3037 LCT Tracker W4 Report WWU FV	2	2	2	2	2	10
3039 LCT Tracker W5 Report WWU FV2	2	2	2	2	2	10
3564 WWU Customer Business Priorities FV2	2	2	2	2	2	10
3636 WWU Customer Priorities Report_Debrief_v3	2	2	2	2	2	10
3830_NEA_Fuel-Poverty-Monitor-Report-2022_V2-1	0	2	2	2	2	8

BECG - What Politicians Think About Net Zero and Green Economy 2022	2	2	2	2	2	10
Biodiversity Stakeholder Meeting Report 28.06.24	2	2	2	2	2	10
carers-week-2022-make-caring-visible-valued-and-supported-report_final	0	2	2	2	2	8
CCC - Reducing emissions in Wales	2	2	2	2	2	10
Ceredigion LAEP Draft A	1	2	2	2	2	9
child-poverty-strategy-for-wales-2024	0	2	2	2	2	8
Compact Hybrids - Customer Research - Final	2	2	2	2	2	10
consultation-just-transition-framework	2	2	2	2	2	10
Customer-of-the-Future-2025-ybs64c	2	2	2	2	2	10
CVS-and-Community-Resilience-Executive-Summary-FINAL	0	2	2	2	2	8
DAR - IM - 220511 - Future leap - The Future of Hydrogen South West Event - Burgess Salmon offices Bristol	0	2	2	1	2	7
DAR - LG - 280623 Welsh Gove HyRES Guide Review	0	2	2	1	2	7
DAR - People Homes Conference 2023	0	2	2	1	2	7
DAR - Welsh Government Hydrogen Trials meeting	0	2	2	1	2	7
Digital.utility.co.uk (2024: The year of the LAEP)	1	2	2	2	2	9
ENA External Stakeholders Insight Report v1.1	2	2	2	2	2	10
ena-innovation-strategy-update_final	2	2	2	2	2	10

Energy Networks Innovation Strategy 2022	2	2	2	2	2	10
EUSP Council Dec 23_ Delivery Board Briefing	0	2	2	2	2	8
Final version WWU - Critical Friends Panel - Feb 2023 - Feedback Report	2	2	2	2	2	10
House of Commons - Support for Innovation to Deliver Net Zero	1	2	2	2	2	9
HyRES Open event summary report v2 23-01-26	0	2	2	2	2	8
ICS-UKCSI-Exec-Summary_Jan22_INTERACTIVE-h2d26m	2	2	2	2	2	10
June 2022 - Hybrid Working Policy	0	2	2	2	2	8
LAEP Technical Report Merthyr Tydfil DRAFT 160524	1	2	2	2	2	9
LAEP_BG_Technical-report_v1.1DRAFT-REVIEW_20240604	1	2	2	2	2	9
LAEP_Flintshire_Technical-report_v1(DRAFT-REVIEW)_20240611	1	2	2	2	2	9
LCP Delta - Online consultation responses summary	2	2	2	2	2	10
LCT Tracker results for WWU FV	2	2	2	2	2	10
Marie Curie Quality Account Report 22-23	0	2	2	2	2	8
Minutes - Council 14.12.23	0	2	2	2	2	8
NEA Cymru - VCMA DAR	0	2	2	1	2	7
NEA-Impact-Report-2023-FINAL-1	0	2	2	2	2	8
Neath Port Talbot LAEP Technical Annex - Client V1	2	2	2	2	2	10

Non-Domestic Consumer Research Report V Final for siteNov 2022	0	2	2	2	2	8
Ofgem-consumer-standards - NEA Response	0	2	2	2	2	8
HyRES Open event summary report v2 23-01-26	0	2	2	2	2	8
PE21199 Understanding consumers' attitudes to safety measures when using 100_ hydrogen in the home v1.0	1	2	2	2	2	9
Permit Schemes Statutory Guidance July 2022	0	2	2	2	2	8
Powys LAEP Draft A	1	2	2	2	2	9
PSR Code Group Report. DRAFT w exec summary 21.11.23	0	2	2	2	2	8
RCT LAEP Technical Report DRAFT 280524	1	2	2	2	2	9
Report - CCC - Delivering a reliable decarbonised	2	2	2	2	2	10
RP-FGS-Monmouthshire Technical Report-070624-DRAFT-ISSUED	1	2	2	2	2	9
RP-FGS-Torfaen Technical Report-240520-DRAFT-ISSUED-v2	1	2	2	2	2	9
Safeguarding the switch to domestic hydrogen WWU Report 1.0	0	2	2	2	2	8
Stakeholder workshop - Actions Responsibilities P2 - PRESENTATION PACK - CCR_bilingual	1	2	2	2	2	9
Stakeholder Workshop - Baseline and setting p_Lewis Garvey	1	2	2	2	2	9

Swansea LAEP Technical Annex - V2 - Client Copy1 - WWU Feedback	2	2	2	2	2	10
Sweco workshop notes_ waste and carbon	2	1	1	1	1	6
Technical Report Cardiff DRAFT 2024_05_24	2	2	2	2	2	10
Technical_Report - Gwynedd draft issue 07.06.24	1	2	2	2	2	9
Technical_Report_Anglesey_draft issue 14.6.24	1	2	2	2	2	9
Technical_Report_Caerphilly_v.1(d)	1	2	2	2	2	9
Technical_Report_Vale of Glamorgan_2024_05_24	2	2	2	2	2	10
UK-Hydrogen-Strategy_web	1	2	2	2	2	9
UKRI Culture of innovation_Full report_Oct 2023_Pdf_version	0	2	2	2	2	8
UKRI-141123-EnablingNetZeroPlanUK IndustrialClusterDecarbonisation	1	2	2	2	2	9
UKRI-PA-InnovationCultureReport	0	2	2	2	2	8
VCMA Collaborative Report Year 1 21-22	1	2	2	2	2	9
VCMA Collaborative Report Year 2 22-23	1	2	2	2	2	9
VCMA Year 1 Showcase Stakeholder Workshop - Feedback Report	0	2	2	2	2	8
WGP Hydrogen Strategy v2.0 (Summary and Technical Reports) FINAL	2	2	2	2	2	10
Workshop - Actions & Responsibilities P2 - PRESENTATION PACK - NW_shared	1	2	2	2	2	9

Workshop 2 Summary - Futureproofing the networks	0	0	2	2	2	6
Workshop 4 Summary - Transforming how networks interact with industry	0	0	2	2	2	6
Workshop 6 Summary - Network investment	1	0	2	2	2	7
WWU - Critical Friends Panel - Feb 2024 - Feedback Report v5	1	2	2	2	2	9
WWU Biodiversity Stakeholder Workshop Feedback Report	2	2	2	2	2	10
WWU Business Panel_full report with appendix	2	2	2	2	2	10
WWU Citizen Panel full Report_V1	2	2	2	2	2	10
WWU Citizens Panel report Decarbonisation of home heat March 2022 FINAL	2	2	2	2	2	10
WWU Customer Satisfaction_full report	0	2	2	2	2	8
WWU Customer Service Trends Secondary Research - Findings report - Final	2	2	2	2	2	10
WWU Employer of Choice Qualitative Follow-up Findings report v1	0	2	2	2	2	8
WWU FW strategy workshop 180721 final	0	2	2	2	2	8
WWU GD3 Business Planning Workshop Feedback Report	2	2	2	2	2	10
WWU LAEP Stakeholder Workshop Feedback Report	0	2	2	2	2	8
WWU qual priorities report FINAL	2	2	2	2	2	10
WWU Report Cardiff November 2022 LW Comments	1	2	2	2	2	9

WWU Safety Stakeholder Workshop Feedback Report	1	2	2	2	2	9
WWU SSMC response – 6th March	2	2	2	2	2	10
WWU Sustainability Strategy Workshop - Feedback Report	2	2	2	2	2	10
WWU Vulnerability Panel Report_V3_060923	1	2	2	2	2	9
WWU_EVP_Insights_Report_Aug22_v1	0	2	2	2	2	8
WWU_Improving the CEX research programme_Stage 1_Report of findings_17.01.23	0	2	2	2	2	8
Average Score of Sources						8.81
Mode						10

Score	Grade	Description
0-3	Poor	Feedback should not be used for triangulation as it does not meet the minimum quality standards.
4-6	Average	Feedback could be used for triangulation but possible lacks robustness.
7-8	Good	Feedback meets the standards necessary for credible triangulation.
9-10	Excellent	Feedback meets the best standards of rigour and quality.