

BRIEFING NOTE

Developing Local Partnerships for Onshore Wind in England

Insights for local authorities and community organisations: how to respond to the current consultation on developing local partnerships for onshore wind in England.



June 2023

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As part of National Grid Electricity Distribution's programme of support for local and community energy groups in its licence area, it is supporting Regen to provide briefings on key developments that these groups may wish to have a say in. National Grid does not endorse any of the views or policy proposals set out in this briefing.

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About National Grid

National Grid is the largest electricity transmission and distribution business in the UK, delivering electricity safely, reliably, and efficiently to the customers and communities they serve, while working towards a cleaner, greener energy future.

About Regen

Regen is an independent centre of energy expertise with a mission to accelerate the transition to a zero-carbon energy system. We have nearly 20 years' experience in transforming the energy system for net zero and delivering expert advice and market insight on the systemic challenges of decarbonising power, heat, and transport.

Regen is also a membership organisation and manages the Electricity Storage Network (ESN) – the voice of the UK storage industry. We have over 150 members who share our mission, including clean energy developers, businesses, local authorities, community energy groups, academic institutions, and research organisations across the energy sector.

"While it is positive to see greater consideration given to ensuring high-quality engagement and meaningful community benefits for onshore wind, any proposed changes <u>must</u> be accompanied by a change to the planning policy for onshore wind. Support must also be provided for shared ownership."

Dr Rebecca Windemer, Community Energy Lead, Regen

Author:

Rebecca Windemer, Community Energy Lead, Regen rwindemer@regen.co.uk

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Section 1:

Introduction

1.1 The consultation

In May 2023, the UK Government launched a <u>consultation</u> on 'developing local partnerships for onshore wind'. The consultation is led by the Department for Energy Security & Net Zero (DESNZ) and sets out proposed changes to community engagement and community benefits for onshore wind. This current consultation has not been accompanied by any update on the proposed changes to planning policy.

Previously, in December 2022, the Government launched an open consultation on reforms to national planning policy in the Levelling-Up and Regeneration Bill, led by the Department for Levelling Up, Housing and Communities (DLUHC). The consultation set out proposed changes to a wide range of policy areas in England within the National Planning Policy Framework (NPPF), including onshore wind. In our response to that consultation, we called for the Government to remove footnote 54 and treat onshore wind in line with other planning applications.

Responses to the consultation can be submitted online before 11.45 pm on 7 July 2023.

We urge you to respond to the consultation to show the Government that communities and local authorities are positive about the potential for onshore wind in England.

1.2 The purpose of this briefing note

This briefing note aims to support local authorities and community organisations to submit their own response to the consultation. It outlines what the consultation process involves, the key issues raised that might affect local and community energy organisations, and Regen's views on how to respond to the consultation most effectively.

We see responding to this consultation as a vital process to ensure that onshore wind is developed in a way that creates significant benefits for local communities in line with a just transition to net zero. We want to ensure that community benefits reflect the needs of communities and lead to long-term improvements. We encourage local authorities and communities to respond directly, using the consultation as an opportunity to provide the

Government with examples of how they would like to be involved in projects and the forms of benefit they would like to receive.

We are also interested in hearing your views and using these as examples to bolster the response that we are writing from Regen's perspective. Please share your views with Rebecca Windemer at rwindemer@regen.co.uk.

1.3 Regen's view: important considerations, but not going far enough to support communities and deliver new onshore wind

The focus of this consultation is 'developing local partnerships for onshore wind'. The consultation states that 'through the development of a wind farm, developers and communities can be said to enter into a partnership'. It then describes this partnership as having two elements:

- 'Scoping, development and planning', i.e. community engagement
- 'How the community is enabled to benefit from agreeing to host an onshore wind project', i.e. community benefits.

However, we would argue that this is often not a partnership. Rather, it is a process of negotiation through which communities have had varying experiences.

Our view is that local ownership, community benefits and engagement are vital to the success of onshore wind development to ensure communities are not only engaged in the decision-making process but can also benefit from wind farms in their local area. We know there is overwhelming public support for onshore wind¹, and Regen has long been a strong advocate for local ownership models and shared benefit schemes. While the consultation largely focuses on discounted energy bills as an innovative form of community benefits, we feel that there should be a wider discussion on how communities can engage and benefit through a range of routes and the support they may need to achieve this.

What is evidently missing from this consultation on local partnerships is a consideration of how developers and communities could form a real working partnership through shared ownership

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¹ See for example: https://www.renewableuk.com/news/626061/Public-support-for-renewable-energy-reaches-new-record

of onshore wind farms. Shared ownership refers to a financial structure whereby a community group is a financial partner of the wind farm project over the life of the project. The Government previously undertook significant research into this by setting up a shared ownership taskforce comprising representatives from the community energy sector and renewables industry. In 2014, this taskforce developed a report setting out a clear framework to facilitate a voluntary approach to increasing shared ownership of commercial onshore renewables developments. In the 2015 government response to the shared ownership taskforce, it was identified that shared ownership 'can represent new ways for communities and industry to work collaboratively and constructively together on the ground to the benefit of both'.

However, since that 2015 report, no progress has been made on shared ownership. This is despite many calls for it to be progressed, and despite the Government webpage stating that 'we now expect all relevant renewable energy developers to be engaging with this guide and discussing shared ownership opportunities with local communities.' This consultation provides an optimal moment to bring forward the recommendations of the taskforce and enable communities to have the option of shared ownership of new onshore wind farms. Such an approach would facilitate real partnerships between industry and communities and significantly benefit communities.

The impact of any changes to community engagement and benefits will be minimal without a change to the planning policy. The current planning policy is preventing new wind farms from being developed in areas with high levels of support. We are therefore urging the Government to remove footnote 54 of the NPPF

Additionally, while it is important to consider how communities can benefit from developer-led onshore wind schemes, the most benefit that communities can achieve from onshore wind is through developing and owning their own projects. We are therefore calling for the Government to reintroduce funding and support for the development of community energy projects.

Section 2:

What the consultation means for onshore wind in England

In this section, we outline the main proposals for changes to community engagement and benefits for onshore wind identified in the consultation; what difference, if any, these proposals will make in practice; and Regen's view of how the consultation needs to go further to make a sufficient difference.

2.1 Embedding best-practice engagement in planning guidance

2.1.1 What does the consultation say?

In 2021, the Government updated its good practice guidance on 'community engagement and benefits from onshore wind development', but this document is not currently part of Planning Practice Guidance. The consultation suggests embedding the principles of best practice set out in the guidance into the Planning Practice Guidance.

The consultation asks the following question on this proposal:

Q.1: Do you agree with the proposal to embed the principles of best practice engagement into planning guidance?

2.1.2 Regen's view

We support the proposal to embed the principles of best practice engagement into Planning Practice Guidance. The best practice guide on community engagement with wind farms is a comprehensive document. However, there is currently no requirement for compliance with the recommendations. Setting the guide as Planning Practice Guidance should establish a minimum standard that has to be achieved.

We want to emphasise that this approach should be undertaken <u>instead of</u> requiring a measure of community support in planning policy (as required in the current NPPF and in the Government's proposed changes to the NPPF in the previous consultation). International peer-

reviewed evidence consistently shows that high-quality public engagement can increase local support for renewable energy projects. Meanwhile, community support itself cannot easily be measured. Therefore, we reiterate our call for footnote 54 of the current NPPF to be removed so that onshore wind is treated in the same way as other infrastructure in the planning system.

One additional consideration is how statements of community involvement are assessed. Wind farm developers are required to submit statements of community involvement; however, there is currently no scrutiny method to ensure that the best practice guidelines are being followed and that high-quality engagement is being undertaken. With the introduction of this statutory guidance, there may also need to be an assessment of compliance. A suitable method of achieving this could be using independent consultants to scrutinise the statements and their implementation. Depending on the scale of the wind farm development, future responsibility for scrutiny may include Local Authorities or the Planning Inspectorate with an assessment of acceptability to be determined against agreed criteria or indicators.

Additionally, it will be important to regularly review the principles of best practice engagement to reflect the latest evidence or examples of best practice.

Summary of our response:

- We support the proposal to embed the principles of best practice engagement into Planning Practice Guidance.
- This change should be accompanied by the removal of footnote 54 of the NPPF so that onshore wind is treated in the same way as other infrastructure by the planning system.
- We raise the question of whether there needs to be improved scrutiny of statements of community involvement and their delivery.
- We highlight the need for a regular review of the principles of best practice engagement.

2.1.3 Useful evidence communities and local authorities could supply in their responses

For local authority respondents, it would be useful to provide information on how you currently assess statements of community involvement. Do you have the resources to assess them, or do you feel that there needs to be additional support?

2.2 Effective engagement between local communities and developers

2.2.1 What does the consultation say?

The consultation refers to the 2021 government document on <u>community engagement</u> and <u>benefits from onshore wind developments</u>. In particular, the consultation highlights that developers should do the following:

- Plan their engagement, but also design and develop their plan for engagement alongside the community and in response to feedback
- Engage with the community as early as possible and be transparent about their proposal
- Think carefully about the characteristics of the affected local community, recognising that every community is different, and take identifiable steps to reach as many people in that community as possible
- Use a variety of engagement methods to gather feedback, ranging from traditional in-person methods to digital and online platforms and innovative community outreach techniques
- Plan for ongoing engagement across the lifetime of the site.

The consultation asks the following three questions about effective engagement between the community and developers:

- Q.2. What other ways are there to improve community engagement when onshore wind developers consult with the local community?
- Q3. Are there other methods of engagement between developers and local communities that should be considered best practice?
- Q 4. What are the main barriers to effective engagement between local communities and developers?

2.2.2 Regen's view

When considering community engagement, it is firstly important to acknowledge that there is no one-size-fits-all approach as all communities are different; however, there are certain principles that help to ensure that communities are properly engaged. We agree with the principles of best practice engagement guidance set out in the 2021 best practice document. We are particularly pleased to see consideration of engagement across the lifetime of the site.

We would add that community-owned projects are likely to generate higher levels of engagement due to the nature of the organisations being embedded within the local community and due to the community fully owning and thus being the sole beneficiary of the development. As such, we would emphasise the need to provide additional financial support for community energy projects alongside the changes to community engagement and benefits for commercially owned onshore wind projects.

Barriers to effective engagement

Regarding barriers, we see the main barriers to effective engagement between developers and communities as the following:

- Timing of engagement. If developers do not engage communities at the very start of the process, then communities may be unlikely to feel that they are able to have a real influence on the design of the project or may feel that the project has been imposed upon them. It is thus important for developers to engage with communities as early as possible.
- Including the harder-to-reach groups. Effective engagement needs to involve as many members of the community as possible. For example, this needs to include reaching those who may have little time to engage, may have challenges understanding energy projects, or who may feel intimidated by the process. In order to overcome this challenge, a wide variety of engagement methods should be used, and developers should reach out to local community organisations.
- Building trust between the developer and the community. Effective engagement needs to involve the development of trust between the developer and the community. Part of this will result from early engagement and clear provision of information, as well as establishing a clear line of communication. It also involves treating communities with fairness and respect during the decision-making process.
- Listening to what the community want. High-quality engagement involves listening to what the community wants, for example, in terms of community benefits and trying to respond to those requests. This should include demonstrating how community feedback is being captured and used. It should also involve responding to feedback even when the change being asked for can't be made and explaining why that is the case.

• Long-term engagement. Sometimes engagement is only considered during the planning process. Ongoing engagement over the lifetime of the project is very important to ensure that communities continue to benefit from the project. Communities need to have an accessible single point of contact that they can go to if they need any concerns to be addressed. Where this doesn't happen, then concerns and even misinformation can escalate.

Summary of our response:

- While recognising that there is no one-size-fits-all approach to engagement, we support the principles set out in the 2021 best practice guidance document.
- We are particularly pleased to see consideration of engagement across the lifetime of a development.
- Community-owned projects are likely to generate higher levels of engagement, and thus there is also a need for policy and financial support for community energy.
- Key barriers to effective engagement include the timing of engagement, including the harder-to-reach groups, building trust between the developer and the community, listening to the community and ensuring long-term engagement.

2.2.2 Useful evidence communities and local authorities could supply in their responses:

- It would be useful to provide both positive and negative examples of engagement between wind farm developers and communities. This could include evidence of any experiences (positive or negative) of ongoing engagement between developers and communities over the operational life of a wind farm.
- You could provide details on any specific barriers to engagement in your community.
- Community energy organisations may wish to provide evidence of how their community status has affected community engagement relating to their projects.

2.3 Engagement and community support

2.3.1 What does the consultation say?

The consultation contains a brief summary of the December 2022 consultation on onshore wind planning policy. The summary states that the Government's position in that consultation was: 'When deciding on onshore wind planning applications, planning authorities should only issue consent when it has been demonstrated that the planning impacts have been satisfactorily addressed and there is community support for the development.'

The consultation asks two questions about engagement and community support:

Q 5. How can effective community engagement help to gain community support for onshore wind?

Q 6. Are there ways community support for onshore wind can be defined?

2.3.2 Regen's view

How effective community engagement can help to gain community support.

Effective and meaningful community engagement that addresses the barriers set out in question four above has regularly led to greater support for onshore wind². In particular, effective community engagement that involves communities in the design of a project can lead to greater levels of support. If communities have had the opportunity to properly shape the design of the project, then aspects that they would previously have opposed are likely to have been reduced. Effective community engagement should also give communities a say in the form of community benefits that they want to receive. The provision of meaningful community benefits that respond to the needs and desires of the local community can lead to greater levels of support. (We provide more information on this in response to the second set of consultation questions below).

² See for example, Firestone, J. et al. 2018. Reconsidering barriers to wind power projects: community engagement, developer transparency and place. Journal of environmental policy & planning 20(3), pp. 370–386

Ongoing engagement with a community can also help to ensure that support remains over the lifetime of a wind project. Research published in 2023³ has highlighted the need for ongoing engagement with communities over the lifetime of a wind project in order to establish continued trust in the developer, ensure any concerns or misinformation are addressed and ensure that communities are aware of and using the community benefit fund. The research identified that these aspects of continued engagement over the operational lifetime of a wind farm can also influence community responses to applications to repower or life-extend the wind farm.

Defining community support

Regen's position is that community support cannot accurately be measured or defined in a way that is suitable to be placed in policy. The experience with the current NPPF policy has shown that community support is very difficult to measure or evidence. Planning appeal decisions show a lack of consensus on how to interpret the community backing requirement. A referendum approach has been suggested, by some, as a way of measuring community support; however, there are significant challenges to this approach which do not make it suitable for enabling new onshore wind farms to come forward. Implementing a local referendum can be very challenging, time-consuming and expensive. It is not straightforward to identify the host community impacted by a particular energy infrastructure proposal⁴. Wind farm proposals often occur in sites at the border of more than one planning authority, resulting in contrasting community definitions. Tests of community support have been considered by the UK Government in relation to underground storage of radioactive waste, with three mechanisms considered (local referendum, statistically representative polling and formal consultation⁵). However, these have not yet been successfully applied. The timing of a method such as a referendum also creates potential challenges. People's opinions about the merits of wind

³ Windemer, R., 2023. Acceptance should not be assumed. How the dynamics of social acceptance changes over time, impacting onshore wind repowering. Energy Policy, 173, p.113363.

⁴ 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. Energy Research & Social Science, 54, pp.166-175.

⁵ BEIS (2018) Working With Communities implementing geological disposal Available online at: https://www.gov.uk/government/consultations/working-with-communitiesimplementing-geological-disposal

energy developments have changed over time⁶, particularly becoming more favourable once a project is built. Referenda can be divisive, whereas community engagement helps to build agreement and acceptance.

Our position is that focusing on high-quality engagement and meaningful community benefits is more suitable than trying to define community support. This can be evidenced through detailed statements of community engagement and through implementing a transparent process for deciding upon the details of a community benefit scheme. It can also be evidenced by recording the details of community benefits. The idea of a community benefit register was proposed in 2014 but did not materialise. We suggest that this is now implemented.

Summary of our response:

- Focusing on high-quality engagement and meaningful community benefits is more suitable than trying to define community support.
- Effective community engagement should also give communities a say in the form of community benefits that they want to receive.
- Ongoing engagement with a community helps to ensure that support remains over the lifetime of a wind project.

2.3.3 Useful evidence communities and local authorities could supply in their responses:

Community energy organisations may wish to provide additional evidence on the levels of support received for their community-owned projects.

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⁶ Wolsink, M., 2000. Wind power and the NIMBY-myth: institutional capacity and the limited significance of public support. Renewable energy, 21(1), pp.49-64. And Devine-Wright, P., 2005. Beyond NIMBYism: towards an integrated framework for understanding public perceptions of wind energy. Wind Energy: An International Journal for Progress and Applications in Wind Power Conversion Technology, 8(2), pp.125-139.

2.4 Updating the existing Community Benefits Protocol

2.4.1 What does the consultation say?

The consultation states that community benefits are legally immaterial to planning decisions and therefore cannot be considered in the planning decision-making process. The consultation also confirms that community benefit provision should continue to be led by developers with community involvement.

The consultation recognises that there is no one-size-fits-all approach to benefit provision and that it is important that community benefits are flexible in order to respond to individual circumstances.

The Community Benefits Protocol for onshore wind currently involves a commitment for onshore wind developers in England to provide community benefits of £5,000 per megawatt of installed capacity, or equivalent benefits-in-kind, directly to host communities, per year. This was last updated in 2013 by RenewableUK in partnership with the Government. Meanwhile, in 2021, the updated guidance on community engagement and benefits from onshore wind developments set out expectations for developers to involve communities in the design of community benefit schemes and to develop innovative approaches, such as shared ownership.

The consultation explains that, typically, community benefit 'trust' fund payments are used but that there are new innovative models emerging that provide a more direct form of financial contribution. The only example that they provide here is the example of local electricity bill discounts, either through issuing vouchers that can be used with an electricity supplier, translating co-ownership shares that a community has in a wind farm into discounts on electricity bills or by using innovative tariffs that reduce electricity costs for local consumers when the wind is blowing.

In order to facilitate these new models of community benefits, the Government proposes to work with RenewableUK to update the current Community Benefits Protocol for Onshore Wind in England. While focusing on local electricity bill discounts, the consultation welcomes suggestions on other innovative schemes or approaches for communities to benefit.

The consultation asks two questions related to updating the existing community benefits protocol to reflect innovative or emerging schemes:

Q.7: Do you agree with the proposal to update the existing Community Benefits Protocol for community benefits from onshore wind to reflect innovative and emerging schemes, like energy bill discounts? If so, in what ways should the Protocol be updated?

Q10. Are there new or innovative types of community benefits that could be offered from onshore wind developers, such as local electricity bill discounts? Are there alternative approaches to facilitating the provision of innovative community benefits from onshore wind that should be considered?

2.4.2 Regen's view

We support the proposal to update the Community Benefits Protocol to reflect innovative and emerging schemes; however, we suggest that this should provide other options in addition to electricity bill discounts. We also strongly recommend that the community sector should be involved in the update of the community benefits protocol.

Electricity bill discounts could be one of the options offered to communities, but should not be the only innovative option. We agree that, in some cases, this could be a popular option to help communities with the increased cost of energy bills. However, an energy bill discount scheme would need to be done in a way that does not also tie the community to a particular energy provider. We suggest that existing models and experiences of this approach should be investigated in order to understand the perspective and experiences of the communities involved. Electricity bill discounts would also need to be accompanied by clear provision of information and support to communities to ensure that all members of a community understand how to access it. This would need to include consideration of those without internet access. Additionally, the potential negative consequence of this approach in terms of increased household energy consumption should be considered, as research has identified that subsidising the cost of energy can lead to increased energy usage⁷.

Alternative innovative approaches could include community retrofit programmes or providing direct support to existing community energy organisations. The Community Benefits Protocol should also include the option of shared ownership, i.e., enabling communities to become a

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⁷ Albatayneh, A., Juaidi, A., Abdallah, R., Pena-Fernandez, A. and Manzano-Agugliaro, F., 2022. Effect of the subsidised electrical energy tariff on the residential energy consumption in Jordan. Energy Reports, 8, pp.893-903.

financial partner of the wind farm project over the life of the project. We suggest that shared ownership should be offered as an option to communities on all new and repowered projects. Shared ownership can lead to strong economic benefits for the local community. These economic benefits can be used to ensure support to the wider community; for example, through helping those in fuel poverty. Examples of these wider benefits have been seen in shared ownership projects in Scotland⁸.

As the Government stated in 2015 in its response to the shared ownership taskforce, 'by partnering with renewable developers, local communities can benefit from the investment opportunities and share in the commercial expertise and know-how of developers. A community stake in a renewable scheme can also help to create a sense of ownership that can lead to increased acceptance and support at a local level, which is critical for the future growth of the renewables industry.' International peer-reviewed research has also shown that co-ownership of wind farms can lead to an increase in local acceptance⁹.

Regarding innovative facilitation methods, as community benefits packages become more diverse, there may be an increased need for external organisations to administer them. While in some cases this role has been undertaken successfully by local organisations, not all communities will have an organisation with the necessary skills and capacity. This may also become increasingly challenging for organisations as the size of funds increase or as communities become recipients of more than one fund. There is also a need for additional support for those communities who wish to pursue shared ownership. Such support could include impartial advice on the process, risks and requirements, as well as more detailed support on the legal and financial aspects.

Alongside updating the Community Benefits Protocol, we suggest that the Government commit to providing additional support to communities to help them both administer and make informed decisions on community benefits. Support is particularly important for those communities who have no previous experience using community benefit schemes and for lower-income communities. There needs to be accessible information for communities that enable them to understand the different options available. One option could be to provide

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⁸ Schiffer, A., 2017. Shared Ownership in Scotland: opening up citizen participation in renewable energy. Available online at: https://eprints.leedsbeckett.ac.uk/id/eprint/4900/1/SharedOwnershipReportWeb.pdf

⁹ Ek, K. and Persson, L., 2014. Wind farms—Where and how to place them? A choice experiment approach to measure consumer preferences for characteristics of wind farm establishments in Sweden. Ecological economics, 105, pp.193-203. Lienhoop, N., 2018. Acceptance of wind energy and the role of financial and procedural participation: An investigation with focus groups and choice experiments. Energy Policy, 118, pp.97-105.

funding for an organisation to work with communities to help them decide on their priorities for their local area. An approach such as the Community and Renewable Energy Scheme (CARES), delivered by Local Energy Scotland on behalf of the Scottish Government, could be implemented. Part of the CARES scheme involves helping communities to develop a community action plan. Such a plan is used to set out the long-term vision for the community, including what they would like to achieve, investment aspirations and potential projects that could help them to achieve their aspirations. Such a plan can also be adapted to the needs and priorities of a community change. Through developing such a plan, communities can ensure that community benefits respond to the longer-term needs and ambitions of the community.

We also agree that providing community benefits should be immaterial to planning decisions.

Summary of our response:

- While we support the idea of energy bill reductions, this should not be the only innovative method pursued.
- The Community Benefits Protocol should also include the option of shared ownership, i.e. enabling communities to become a financial partner of the wind farm project over the life of the project. We suggest that shared ownership should be offered as an option to communities on all new and repowered projects.
- The Government needs to provide additional support for communities regarding deciding how to spend the funds and help in administering the funds.
- We agree that providing community benefits should be immaterial to planning decisions.

2.4.3 Useful evidence communities and local authorities could supply in their responses:

- If you have experience with innovative forms of community benefit such as electricity bill discounts, it would be useful to share your experiences.
- It would be useful to share any experiences of or desire for shared ownership.
- Information regarding if communities in your area would need help in administering community benefits or in knowing how to decide on what form of benefits to pursue.

2.5 Experiences of the current system for community benefits

2.5.1 What does the consultation say?

The consultation wording recognises that community benefits provide an opportunity for communities to access long-term funding that is reliable and flexible. It notes that a wide range of community projects can be supported through this approach and that the funding can be used to provide enhancements to the local area, including to the environment, society, and economy. It recognises that community benefit funds are usually paid by the developer into the community trust annually and that these trusts are often administered by a local organisation, such as a parish council. The community then applies to the fund with projects that meet a preagreed criterion. The Government recognises that this process can sometimes be burdensome and lead to delays or a lack of activity.

The Government sees the delivery of community benefits as a way in which the community can directly benefit from hosting the infrastructure. It also recognises that communities have different preferences and needs for community benefits, and therefore that flexibility is needed.

The consultation asks three questions on experiences of the current system for community benefits in England:

Q.8: How is the current system for community benefits from onshore wind working? Can it be improved and, if so, how?

Q9: What community benefits packages are currently being offered by onshore wind developers and are the packages being offered sufficient?

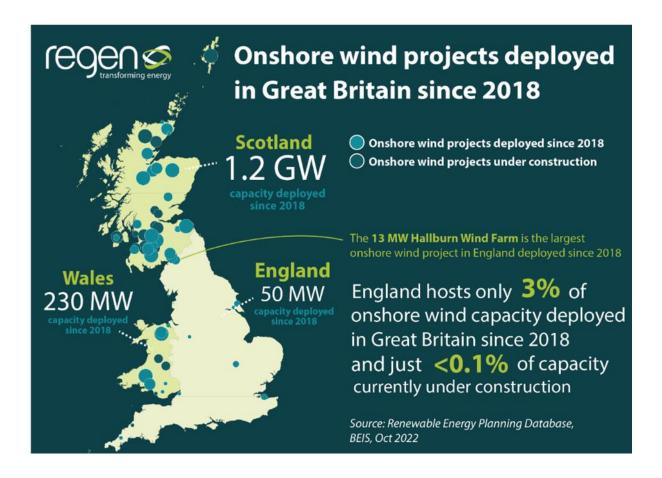
Are there other ways the host community should benefit?

Q11: What challenges do communities and onshore wind developers face when designing and implementing community benefits?

2.5.2 Regen's view

Firstly, it is important to recognise that there will not be any new community benefit funds without new onshore wind projects. As set out in the image below, the current planning policy has significantly impacted the ability of onshore wind to be delivered in England. We therefore urge the Government to remove footnote 54 of the NPPF as soon as possible.





There are numerous cases in the UK where community benefit funds can be seen to have made a positive contribution to communities. Research¹⁰ has identified that in some cases, community benefits also appear to positively influence perceptions of wind farms over a longer period and can influence responses to repowering applications. This positive response has occurred when communities have been able to recognise the benefits that the wind farm has provided over its life, for example, in being able to identify and value the projects that the community fund has supported. However, not all experiences of community benefit funds have been positive. There have been cases where communities have reported having a negative experience of community benefits because they have not been aware of the funding or the types of projects that they can spend money on or due to challenges of accessing the funding.

¹⁰ Windemer, R., 2023. Acceptance should not be assumed. How the dynamics of social acceptance changes over time, impacting onshore wind repowering. Energy Policy, 173, p.113363.



We suggest that there are improvements to be made to ensure that all communities are able to maximise the potential long-lasting positive impact of community benefits. The current system of community benefits can be improved through increased flexibility in terms of the forms of community benefits available and through providing additional support and guidance to communities. We set out these aspects in response to questions 7 and 10 above.

Increasing the flexibility of community benefit funds means they can more accurately respond to community needs. As we set out in our response to questions 7 and 10, communities should be provided with support to work out what form of benefit would be useful.

Community benefits must respond to the needs of the community and reflect the types of benefits that they want. The process of deciding upon a suitable community benefits package should involve an open process of dialogue between the developer and community; the process should help to identify what form of community benefit could lead to a long-term tangible benefit. Part of this needs to involve the provision of clear information to the community so they are aware of the different potential options. This must also be a transparent process that facilitates trust between the community and the developer. Engagement and discussions on community benefits should be separate from the wider community engagement on the scope of the project. It should also be made clear that contributing to community benefits discussions does not affect a community member's decision to oppose or support a development.

As we set out earlier in this document, shared ownership should be an option for enabling communities to achieve a more substantial benefit from hosting onshore wind infrastructure. As well as providing an option for shared ownership, commercial developers could also look for additional ways to support local community energy organisations. This could include helping a community energy organisation with feasibility work for their project or staff donating their time to help support the community energy project.

Aside from communities benefiting from commercial projects, there is also a need to enable communities to develop and own their own onshore wind turbines. To achieve this, we suggest that there needs to be a change in government policy to provide financial and policy support for community energy.

Challenges of designing and implementing community benefits

There are a number of challenges that need to be addressed to ensure the successful implementation of community benefits. Firstly, there is a challenge of engagement – ensuring that the wider community is involved in the design of the community benefit scheme, rather than a vocal minority. Effective engagement is important for ensuring that the community benefits scheme reflects the needs of the wider community, not just those of the most vocal

and active members of the community. Responding to this challenge involves communicating the opportunity amongst a wide range of groups. This process can take time in terms of identifying and speaking to relevant community organisations and groups.

Linked to engagement is developing a real understanding of how the community could best benefit. As we set out earlier in this document, some communities may require additional support in terms of understanding how to use a community benefit find and to decide on their priorities. While some communities may have existing networks or groups to assist with these opportunities, other locations may not. Managing a community benefit fund can also create challenges. In some cases, this has worked well. However, in other cases, there is a clear need for an intermediary organisation that can administer funds.

An increasingly prominent challenge in certain locations occurs when a community is the beneficiary of a number of community benefit funds. There have already been examples where a small community has run out of projects to spend community benefit funding on due to restrictions having been placed on what community benefit funds can be spent on¹¹. In these cases, there is a need for developers to work with the community to consider how these communities can best benefit. This may involve different developers communicating and working together in terms of creating a more flexible fund. It could also involve innovative methods, such as using community benefit payments to help communities with a shared ownership investment opportunity.

An additional challenge lies in long-term considerations. The area surrounding a wind farm changes over its operational life, as does the local community. Repowering provides an opportunity to re-consider the form of community benefits and to recognise that the community may want a different form of benefit.

Summary of our response:

- There will not be any new community benefit funds without new projects, so we urge the Government to remove footnote 54 of the NPPF.
- There have been both positive and negative experiences of using community benefit funds.
- Community benefits need to be more flexible in order to respond to community needs.

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¹¹ Windemer, R., 2019. Managing (im) permanence: end-of-life challenges for the wind and solar energy sectors (Doctoral dissertation, Cardiff University).

- Engagement and discussions on community benefits should be separate from the wider community engagement on the scope of the project.
- As well as considering community benefits from commercial projects, there is a need for Government to provide support for community energy projects.
- There is a potential challenge where wind farms are receiving multiple community benefit funds.

2.5.3 Useful evidence communities and local authorities could supply in their responses:

- If you are receiving community benefits, are these reaching certain groups within your communities over others?
- If you have experience receiving a community benefit fund, how has this been administered? Has the administration worked well, or have there been any challenges?

Section 3:

Conclusions

Onshore wind has a critical role to play in achieving net zero, as well as being capable of providing a host of local economic benefits and thus supporting a just transition. This consultation provides an important opportunity to consider how communities can be meaningfully involved and benefit from onshore wind development. However, there are a number of aspects not covered within this consultation that we feel are very important:

- A positive planning environment is needed for wind in England. Changes to community benefits and engagement will not have the desired impact unless the planning policy for onshore wind farms is changed. There won't be any new community benefit funds if there aren't any new projects. We therefore continue to urge the Government to remove the additional hurdles to onshore wind planning in England by fully removing footnote 54. This will give local authorities, communities, developers, and investors the confidence to pursue new schemes.
- There needs to be inclusion of support for shared ownership. Shared ownership provides the opportunity for a true 'local partnership' between developers and communities. The evidence and suggestion of how this can work in practice have already been undertaken by the 2014 shared ownership taskforce. We are thus asking for shared ownership to be available as an option for communities on all new and repowered wind farms. We suggest this is included in the updates to the Community Benefits Protocol.
- Support needs to be provided for communities in using/administering community benefit funding. Without greater support, there are likely to be communities that face challenges in accessing and using community benefit funding. Challenges in accessing funding have been seen to contribute towards negative perceptions of a wind farm over time and could impact acceptance of future projects. We suggest that the Government introduces a support scheme to help communities in deciding what form of benefits they would like to receive and how to administer the funds. The CARES scheme in Scotland provides an excellent example of this type of support.

• Support for fully community-owned onshore wind projects. As well as changes to planning policy, community benefits and community engagement, there also needs to be support for communities to develop and own their own onshore wind projects. We are therefore asking the Government to introduce funding and support for community energy. In particular, now that the Rural Energy Community Fund is no longer available, there is a need for seed funding for both rural and urban communities.

Section 4:

Next steps and how to respond

4.1 Having your say

You can respond directly online via the online consultation portal Citizen Space <u>here</u> or by emailing a response to <u>onshorewind@beis.gov.uk</u>. The deadline for responses is 11.45 pm on 7 July 2023.

We strongly encourage local authorities and community energy groups to have their say in the consultation by submitting a response.

We see responding to this consultation as an important process to ensure the Government's changes to the policy on onshore wind are as meaningful as possible.

4.2 Next steps

Regen's response to the consultation will be based on this briefing paper and further discussions. If you have views that Regen could include in our response, please share these with Rebecca Windemer (rwindemer@regen.co.uk). We will share our response online.

To keep up to date with Regen's work on this consultation and other relevant work in the future, sign up to our community energy or local authority newsletters via the <u>form</u> on our website.





Regen Bradninch Court, Castle St, Exeter EX4 3PL

01392 494 399 www.regen.co.uk

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