

July 2023

Community Energy England response to government consultation on Developing Local Partnerships for Onshore Wind in England

Introduction to Community Energy England

1. This is a response by Community Energy England (CEE), which represents over 270 community energy and associated organisations across England involved in the delivery of community-based energy projects that range from the generation of renewable electricity and heat, to the energy efficiency retrofit of buildings, to helping households combat fuel poverty.
2. Our vision is of strong, well informed and capable communities, able to take advantage of their renewable energy resources and address their energy issues in a way that builds a more localised, democratic and sustainable energy system.
3. Community energy refers to the delivery of community led renewable energy, energy demand reduction and energy supply projects, whether wholly owned and/or controlled by communities or through partnership with commercial or public sector partners.
4. The overwhelming motivation of people and groups involved in community energy is to make a contribution to averting climate catastrophe, followed by a desire to bring community and social benefit.
5. We believe that these motivations should be shared by all working in the energy sector and on energy system transformation.

Summary and general comments:

1. We support the ambition to engage better around onshore wind and to deliver benefit to communities.
2. But the worthy aims of the consultation will remain unrealised if no new onshore wind can be built in England. This will remain the case until real planning reform ensures that onshore wind is treated the same as any other energy infrastructure. We, and everyone we have spoken to in the industry, do not believe that the proposals in the recent NPPF consultation will create the confidence or certainty developers and investors need to bring forward new onshore wind projects in England. This consultation's proposals do nothing to change that.
3. Community energy engages better already because the project is done by the community, with the community, for the community. Its profits are entirely dedicated to community benefit, of which it delivers up to 34 times more than commercial projects.
4. However we are deeply disappointed by the consultation. It only envisages developers doing projects to communities in return for benefits. The promise to "develop partnerships" made in the Energy Security Strategy is not fulfilled by this consultation.

5. We support the vision that “a low-cost net zero system of the future will predominantly be comprised of home-grown clean energy, such as wind (both offshore and onshore) and solar...” Sadly, the conditional statement “Achieving this could include a significant increase in locally supported onshore wind to 2030 and beyond.” is very unlikely to happen under government proposals in this and the previous NPPF consultation.

Questions

Questions on Engaging the Community

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

1. Yes
2. BUT no matter how good the engagement is this will not, of itself or in combination with improved guidance on community benefit, result in more onshore wind or more community benefit.
3. **Following feedback from our members on these proposals, we express extreme disappointment with the consultation as a whole. As there is no facility for general comments within the consultation framework, we have included our disappointment here to ensure that this is reflected in the government’s reporting of consultation responses.**
4. The government’s proposals contained in the recent NPPF consultation will not enable significant, or indeed perhaps any, new onshore wind. Too many uncertainties remain for developers or investors to take the risk. Simply “encouraging”, “facilitating”, creating expectations of the partnership that “can be said” to exist between developers and a local community does not make it exist or make projects happen.
5. A local council who wants to block still has many ways to do so. Many will be afraid that the imprecision of such words as ‘satisfactorily’ or ‘acceptable’ may allow consented projects to be expensively challenged by motivated objectors. The burden of designating areas for onshore wind or dealing with different types of Planning Orders will mean many local authorities will not attempt to do so or discourage. Even the added burden of judging whether the engagement process has met Planning Practice Guidelines may cause Planning Authorities to deter developments locally.
6. **The previous footnote 54 to the NPPF should be deleted and Planning Practice Guidance amended accordingly or we will not have to worry about community engagement or benefit from onshore wind in England because there will not be any wind development.**
7. The consultation document seeks input on ‘proposals’ on engagement and ‘proposals’ on benefit. This whole consultation contains 2 proposals which is frankly disappointing:
 - a. to embed ‘principles’ in the planning guidance which creates an expectation that engagement will be “undertaken according to best practice” and that it should be demonstrated in the planning application.
 - b. to update the existing Community Benefits Protocol for community benefits from onshore wind.

8. There aren't any material examples of what the government proposes should be in the best practice or the updates.
9. In the British Energy Security Strategy the government said "Our plans will **prioritise putting communities in control**. We will not introduce wholesale changes to current planning regulations for onshore wind **but will** consult this year on developing local partnerships for a limited number of supportive communities who wish to host new onshore wind infrastructure in return for benefits, including lower energy bills" (our emphases).
10. It continued, "The consultation will consider how clear support can be demonstrated by local communities, local authorities and MPs." The government makes no proposals to stimulate this consideration which is disappointing given their continual insistence on "locally supported" renewable energy.
11. Community energy organisations do not feel that even supportive communities have been given any agency or control that enables them to do onshore wind in a way that was previously prevented.
12. The Energy Security Strategy led us to believe that if 'a limited number of willing communities' could 'demonstrate clear support' in ways this consultation would reveal, then the government would look at "developing local partnerships" that would enable the project to happen. The consultation was presented as something they would do as a counter to not introducing wholesale changes to planning. It is not irrational to construe that as the government offering a concession to put communities that demonstrated 'clear support' for onshore wind 'in control' of being able to make or enable it to happen.
13. It seems we were misled.
14. The consultation document says "Through the development of a wind farm, developers and communities **can be said** to enter into a partnership." Instead of the government actively "developing local partnerships", the existing or potential partnership that "can be said" to exist between developer and community is to be 'facilitated' and 'encouraged'. By adding principles to planning guidance the government hopes to strengthen the 'expectation' on developers to demonstrate best practice in their engagement.
15. The consultation document says "we expect the proposed changes would improve engagement with local communities, which may facilitate improvements in planning applications and more deployment". The whole outcome of "more deployment", which we so urgently need to meet government targets and legal decarbonisation obligations, is pitifully conditional: "we expect... would improve... may facilitate...". None of this feels like the committed action that we need to achieve net zero.
16. Without wholesale changes to planning to put wind on a par with other infrastructure, virtually all in the industry are agreed that developments will not come forward for the community to engage with or planning to examine let alone get built and deliver energy and benefit.
17. Another problem is the rather paternalistic assumption that communities "host" onshore wind, rather as a 'host organism' may suffer a parasite.

18. Many “supportive communities” are very proactively seeking to do onshore wind themselves, taking complete control of the way the project is conceived and developed and the much greater community benefit that will accrue than if they simply ‘engage’ with a commercial developer.
19. One of the few wind projects developed in England since 2015 is the largest single turbine in the UK standing 150m to its tip height near Lawrence Weston in Bristol whose [Ambition Community Energy](#) developed it. Revenue from it will go directly to the community organisation Ambition Lawrence Weston to benefit 3500 deprived local households. The project was passed unanimously by the Local Planning Committee. These people deserve the opportunity to develop their own projects and to own the benefit from their energy transition.
20. At CEE we have been preparing the numerous community energy organisations who are keen on developing wind to engage their communities to demonstrate (when they knew what form that should take from this consultation) that they wished to host onshore wind, in the expectation that the government’s consultation proposals would enable those projects to negotiate planning because they were demonstrably ‘locally supported’.
21. Community Energy England held an event in early March, [Community Onshore Wind - from Idea to Reality](#), to scope out the opportunities and challenges ahead of the eventual opening up of onshore wind by this government or the next. We had identified 190 community energy organisations active in areas of high wind potential. Ninety people attended and 21 organisations responded to a poll to say they were actively considering onshore wind projects, the vast majority at medium to large scale. None of them considers that current government proposals will enable them to initiate their projects.
22. Members have been forth-right in expressing their disappointment in this and the recent NPPF consultation.

Recommendations

23. **Guidance should be as far as possible consistent with best practice guidance in Scotland and Wales** as developers operate UK wide. The Scottish Government is currently developing an Onshore Wind sector deal with the renewable energy industry, which aims to accelerate progress towards achieving onshore wind targets. It is expected to be published in Autumn and we would urge that best practice in engagement and community benefit is harmonised, always adopting the best of the best.
24. **The government must more proactively promote the essential importance of onshore wind**, including among its own MPs and policy makers but particularly among the wider population and councils who will have to welcome and consent to it.
25. **Training and resources must be made available to local councils to enable them to perform any additional scrutiny or duties.** (Designating areas as suitable wind should be removed as a duty from the NPPF). Otherwise local authorities will continue to be a blocker to onshore wind. The NPPF must be reformed so that elected members cannot oppose onshore wind when the community is genuinely supportive. See our [response to the NPPF consultation](#).

2. What other ways are there to improve community engagement when onshore wind developers consult with the local community?

1. The consultation document speaks of “engagement, consultation and participation”. The question text has already downgraded it to ‘consult’ which on the [New Economic Foundation’s ‘ladder of participation’](#) is classed as tokenism and usually means ‘we tell you what we intend to do, you tell us what you think and we do it anyway’. That is most people’s experience of consultation.
2. Partnership implies working together, contributing together to shaping an outcome. This necessitates participation. The community partner must feel and see that their input can and does affect the direction of the project - not just “revising the size and/or layout of developments in response to feedback.” See [NEF’s Participation Works](#)
3. The best engagement comes when the community has a genuine stake, ideally through originating and owning the project. They then are part of conceiving and designing the project.
4. This also gives them [34 times more community benefit](#) than the community gets that just ‘hosts’ a commercial developer’s project. That too increases incentives to commit to the technology and to seeing it done right.
5. An early and good example of a successful community-led project that worked with the community to mitigate impacts and meet community needs is the [Hockerton Housing Project’s 225kW community wind turbine](#) (second hand) which powers the equivalent of 54 local homes. The link also has an excellent 10 minute film on their community engagement which engaged with every community member to determine the optimum siting for the turbine.

3. Are there other methods of engagement between developers and local communities that should be considered best practice?

1. The approach should be flexible as no two communities are the same.
2. The updated guidance stipulates engaging early. This should involve **partnering with the community to co-design the engagement process together** so that it happens on their terms. A menu of potential options should be provided for the community to select from when co-designing the engagement. It should not be prescriptive but should insist on principles (e.g. inclusive, open, creative, visionary, active, empowering...) and a good range of differing techniques. It should be superbly and independently facilitated by someone with no stake in a particular outcome. The process should empower the community (with training if necessary) to take the Power to Convene and **co-produce the engagement**. Community members should increasingly be involved in facilitating the process. It should actively seek to give the community a voice and to create interconnection which strengthens and increases resilience in communities. Lots of small group work at events, for instance, gives more people voices, promotes understanding within the community of different people’s points of view and requires participation.
3. Alongside online and digital consultation methods, the engagement should be creative and visionary, imagining how the community could be improved - to inform thinking and

motivation about benefit from the start. The work of the Transition movement, which originated so many community energy organisations, is founded in imagining a better future and working back to create a pathway towards it. See <https://transitionnetwork.org/wp-content/uploads/2020/11/What-If-Visioning-Exercise-1.pdf> for example.

4. Engagement should be active and participatory involving participatory, visual, physical, experiential and hands on planning engagement techniques such as [Planning for Real](#), site visits, involving communities in wildlife surveys and similar to create 'before' picture to inform discussion of how the 'after' could be better and developing targets for improvements eg doubling biodiversity, moth/plant species, habitats etc.
5. Whatever engagement techniques are used must be checked for how inclusive they are and any member or part of the community who might not be able to participate must be actively included in an alternative way.

4. What are the main barriers to effective engagement between local communities and developers?

1. **Mistrust.**
2. On the flipside, community energy organisations, because they dedicate their entire profits to local benefit are seen not to be in it for the money, are trusted to give good advice. They are also [4-5 times better at engaging with the community](#) than commercial players and even than local government. Where possible they should be enabled to develop the wind projects.
3. **Lack of engagement by some members of the community.**
4. Extra effort must be made to reach those who are disengaged or are unable to engage. Engagement could take place in community hubs with food provided, for instance, to help those who are struggling with high living costs and daily pressures to take part. In the NW of England, the proposal of a community EV car club drew in residents that would not have turned up to an event on energy - who later became avid proponents of a community hydro scheme to enable the car chargers which couldn't be connected because of grid constraints. So leading with potential benefits may reach people who otherwise won't engage.
5. Equally preventing a vocal minority of opponents from dominating or spoiling the engagement is important. Given the statistical majority support for onshore wind in the country including when proposed close to where people live, it will be powerful to bring together active supporters and to keep a positive, visionary approach which is more likely to convince potential opponents.
6. **Lack of engagement skills on the part of the developer or their local agents..**
7. Employ skilled engagement professionals such as organisations who have designed and carried out many citizens' assemblies recently or [Seeds for Change](#) who also do excellent training which the developer may access with the community.

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

1. Effective and early community engagement as described in 2 and 3 above and in the government's guidance should show the community that the developer is responsible,

responsive, flexible, inclusive and cares about the community. If genuine dialogue and co-design occurs from the outset, the community is pulled in as contributing partners. The sense that they can change outcomes is a powerful incentive for continued involvement and engagement with the developer partner.

2. Good engagement brings immediate social benefits in increased interconnection in the community, the feeling of being listened to and valued, of contributing to the solution, which can enhance wellbeing and community resilience for the long term and create a supportive cohort for the project and its community benefits in the long term.
3. A strong supportive group is much more likely to draw in and convert the nay-sayers than an impersonal, informational consultation process.

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

1. It is deeply disappointing that the government makes no effort in the way of proposals in this consultation to “consider how clear support can be demonstrated by local communities, local authorities and MPs”.
2. It would be good to have some steer of what the government is thinking of when it so often, rightly, emphasises “locally supported”.
3. The government acknowledges the huge support for onshore wind and that only 12% would oppose yet bases its unwillingness to make “wholesale changes” to open up onshore wind in England on the “range of views” which has allowed the vocal opposition of a minority of MPs, activists and Councillors to block essential progress.
4. Community support is best shown when the community devises and promotes to its own community a proposal. This is much the most likely to result in strong support among the community.
5. More important than trying to define whether a community is supportive ahead of a project is to require evidence of a thorough and inclusive engagement process, including evidence of how the process influenced or changed the proposal, along with letters and statements of support. Adding best practice engagement to the Planning Practice Guidance is likely to encourage more thorough engagement.

Questions on Community Benefits from Onshore Wind

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?

1. Yes.
2. We agree it should be flexible and be able to be tailored to the changing needs of the individual community. This should be built in during the co-design process with the community which should strive to set up a committed community organisation to manage the community benefit and the ongoing relationship with the developer.
3. Community energy organisations have discovered synergies with wind development that commercial wind developers are unlikely to be interested in. For instance, a wind

development producing cheap power can make a community heat pump and heat network financially viable. Such creative link-ups should be encouraged in the Community Benefit Protocol.

4. The proposal that “the provision of community benefits should continue to be developer-led with community involvement” stacks the cards in the developer’s hand, creating an unequal benefactor/recipient relationship. The fact that community wind can deliver up to 38 times more benefit than commercial projects (see below) suggests that commercial projects prioritise profit over the community.

Recommendation

5. **The community should be able to see the financial planning and demand a larger share of the surplus, and build a profit sharing arrangement** that enables them to benefit more at times of high energy prices. Shared ownership is one such model. See 10.6-7 below.
6. We do not support payments to individuals rather than for wider community benefit. These are not likely to be able to take much account of need. Practical, in-kind benefits such as biodiversity enhancement work, may be as good a way as accumulating a fund to then pay for the work. This must be consented by the community.
7. **However this lone proposal to update the existing Community Benefits Protocol does not go far enough** and the consultation document does not give enough information for us to formulate a useful response.
8. Too little information is provided about the Community Benefit Protocol under which developers (that sign up to it) commit to £5000 per MW installed per year in community benefit.
9. No assessment is provided of how effective the Protocol has been in leveraging community benefit payments. What percentage of developers have adopted the Protocol and abided by it? What is the average MW payment in England? It may be that so few onshore wind projects have happened since, and those that have are probably by exceptional developers, that the figure would be unrepresentative.
10. Evidence from Scotland’s community benefits register, maintained by Local Energy Scotland, shows that the average value from recent renewable energy projects (across all technologies) is £4,417 per MW for those projects that have submitted their information to the register: [Community Benefits Map · Local Energy Scotland](#). We don’t know whether projects that pay lower simply don’t submit information. We would encourage you to contact the Local Energy Scotland team to get specific onshore wind information.
11. An Onshore Wind sector deal between the renewable energy industry and Scottish Government, which aims to accelerate progress towards achieving onshore wind targets, is currently under development and is expected to be published in Autumn. Hopefully that will also consider community benefits beyond the purely financial. We urge you to coordinate closely with that process.
12. Community-owned wind in Scotland delivers on average [34 times more financial community benefit](#) than commercial projects! This is compared to the £5000 that is recommended not

the £4,417 that is actually paid by commercial developers. Compared to that community wind is 38.5 times better.

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

1. Since there has been hardly any onshore wind in England since 2015, shortly after the Protocol was developed in 2013 we do not have enough information to comment. The main block to community benefits in England is the block the planning system places on doing the projects that will deliver the benefit.
2. We believe the government's 'Community engagement and benefits from onshore wind developments: good practice guidance for England' is fit for purpose but could be more creative and imaginative as described in 2 and 3 above.
3. We urge looking at work in Wales where shared ownership is being developed with 10% recommended on government land and the current recommended level which developers are happy with standing at 15%.
4. The situation in Scotland is described in the [Aquatera report](#) linked elsewhere in this response. We urge you to read it for the description of how community benefit is working among commercial and community projects - which deliver on average 34 times the benefit of the commercial ones.
5. The Protocol recommendation of £5000 per MW installed per year is worth having but as the community projects, once maintenance and finance costs are defrayed, are able to deliver 34 times that amount (£170,000 per MW per year) it shows that commercial projects, especially in current market circumstances, could deliver a lot more. We understand that the Protocol is voluntary.

Recommendations

6. **We recommend that Community Benefit Protocol is made mandatory at a level above £5,000.** This will level the playing field and prevent some developers winning in the CfD auctions by paring down their community benefit payments. The Costs section identified that community benefit costs may be passed on to the general public in increased CfD payments. Currently all wind projects are bidding in at below wholesale prices so the wealth is flowing in the other direction. If we want benefit from commercial projects we must recognise that, given they will protect their profit margin, it will have to be paid for somewhere.
7. **We recommend that a community benefit register should be established and made mandatory.** A study should examine any relationship between developers paying low levels of benefit and those winning CfD auctions through under cutting others.

9. 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?

1. We do not have information about benefit packages offered by commercial developers. We urge you again to read the [Aquatera report](#) earlier cited which gives various examples of community benefit packages including "a private developer in Orkney [who] has recently put

forward shared ownership models which would provide the local population with the opportunity to buy into at least 10% of the proposed development, a community benefit payment of £5,000 per installed MW per annum and a contribution of £1,000 per installed MW per annum for the purposes of tackling fuel poverty. (Hoolan Energy, 2019).”

2. A correspondent from Auchrobert Community Energy Society (ACES) which owns a stake in Auchrobert Windfarm and is one of the Energy4All family of community energy organisations writes: “Community energy organisations are focused on benefiting communities. Unlike commercial generators, who pay a fixed rate of community benefit based on installed generation capacity with most of their profits going to shareholders, community energy companies use their profits to fund community projects. This difference has become increasingly obvious in the last few years due to the high price of electricity. In the last year, Auchrobert Community Energy Society, a relatively small organisation distributed £20,000 of community benefit and our sister organisation Spirit of Lanarkshire Wind Energy Co-op which owns stakes in West Browncastle and Nutberry windfarms distributed almost £200,000 to local communities. These funds supported a range of projects including helping communities become more energy efficient, providing warm spaces over the winter and supporting local foodbanks. This compares very favourably to the £1.3m of community benefit paid by SSE from the whole of the Clyde Windfarm over the same period. (200+ wind turbines). Community energy therefore clearly has an important role to play, not just in bringing about the renewables revolution we need to tackle climate change, but in supporting communities through these difficult times.”

10. 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?

1. Community energy organisations are strongly motivated by providing climate solutions and delivering community benefit. If they are involved in distributing the community benefit it is more likely to focus on energy efficiency which has the potential to deliver both objectives. See the example at 9.2 above
2. The mandatory Community Benefit Protocol should recommend that the design of the community benefit with the local community should focus on delivering at least a proportion of the community benefit via energy efficiency measures targeted at vulnerable consumers. See 9.1 above. This can even be the instrument for setting up a local community energy organisation. This way the benefit can yield energy bill savings year on year which compound the monetary value of the benefit, deliver increased carbon savings from installation of the renewable energy and enable it to go further, supplying more people’s needs. In this way a virtuous circle is established.
3. If local supply were possible then community energy would be very keen to supply local renewable energy more cheaply. The [Energy Local](#) scheme does so at a number of locations taking advantage of the Complex Site derogation. In Brixton it supplies solar electricity to social housing residents living beneath the panels at 6.3p p kWh. The [Flexon modification](#)

[P441](#) seeks to make this a permanent part of regulation, which would allow local supply using virtual net metering. This should be supported by government as a quick and partial but useful solution to local supply. It would enable wind projects to supply local customers more cheaply thereby delivering financial benefits but also enabling the possibility of flexibility - demand shifting to access cheaper local energy - which would bring both carbon and system benefits including reduced cost of network reinforcement.

4. The consultation mentions “shared ownership”. It should be built into schemes as an up front offer of at least 15% (as increasingly is happening in Wales). In the Netherlands, all onshore wind and solar developments have to offer up to 50% investment opportunity for local communities. If it is not taken up then it can be made available to other investors. Investments are being managed through a structure led by coops and not by bankers. This will hugely increase participation in the energy system. The Dutch government has also developed a community Feed-in Tariff at 14.6c/KWh.
5. It may also be possible to offer free shares to the local community as part of the community benefit which would provide a compounding benefit delivering returns year on year.

Recommendations

6. **We recommend that community ownership should be made mandatory. An offer of 15% of shares should be made available to local people.** The offer should confer democratic rights and not just be part of a scheme which confers benefit (interest or cheaper electricity - like Ripple) but without representation. The level of community offer should increase as it becomes better understood by communities and as demand rises.
7. **The government should conduct the overdue review** of the [Infrastructure Act 2015, Schedule 6 - the Community Electricity Right](#) - as soon as possible to put in place the required regulation to make this right to shared ownership a reality.

11. What challenges do communities and onshore wind developers face when designing and implementing community benefits?

1. **Getting planning permission.**
2. The consultation document confidently states that, “Community benefits are legally immaterial to planning decisions and cannot be taken into account when deciding whether an onshore wind proposal should go ahead or not, nor whether a community is supportive.” Yet the [Supreme Court overturned a planning permission](#) on Resilient Severndale’s planned turbine on the grounds that Community Benefits mentioned in the planning application “were proffered as a general inducement to the Council to grant planning permission and constituted a method of seeking to buy the permission sought, in breach of the principle that planning permission cannot be bought or sold.” Had a commercial application for the same turbine been made, without any community benefit provision, it would not have been susceptible to challenge. Community developers have been deterred by this ruling. Resilient Energy in particular have not attempted any further projects.
3. Please clarify the legal position on this.
4. **Trust and identifying needs.**

5. Locally based community organisations will be more trusted than a commercial partner and will know the changing needs of the community better. The local organisation should encourage representation from across the community. If they have a shared ownership stake rather than are just there to administer the fund, this creates longevity as they have a legal obligation to distribute dividends to investors and should have a genuine stake and say in the running of the project. This can also help overcome the “delay and inactivity” that can afflict an organisation that just meets occasionally to hand out money. Professional help and support should be available to assist this local organisation.
- 6. Fairness and targeting genuine need.**
7. Ensuring that those in most need of support receive the benefit can be challenging. Funds that require applications are more likely to fund causes and groups that are run by capable, empowered people who are good at applying for funds. Being able to proactively award funds to needy causes and even initiate and fund projects is a useful and powerful way of targeting real need. This can be a more empowering and proactive model of philanthropy. If it is also in service of the community vision (which should be revisited and revised at regular intervals) that was created as part of the engagement process it will also be more motivating than if it is merely making available funds for local good.
- 8. Complexity**
9. Some benefits such as reduced price energy, may involve multiple stakeholders such as suppliers, meter companies, as well as complex contracts and accounting.

Analytical Annex Questions

12. Do you agree with the impacts that have been identified? Please provide data and evidence to support this. If not, explain why with supporting evidence.

1. Developers, councils, government and communities may “incur time costs” to create and familiarise themselves with the new principles or best practice. But the long term benefits will outweigh this one off cost. Was this impact considered when Footnote 54 and the WMS were imposed?

13. Do you think there are other impacts that have not been identified? If yes, what other impacts are there that have not been included? Please provide supporting evidence.

1. If energy efficiency can be at least partially targetted by community benefit funds there will be additional and ongoing carbon and cost saving benefits.
2. Speeded up planning because the discussion is had - with the proposal modified in response - ahead of it being in the planning system.

Signed by:

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Further Information:

Community Energy England (CEE) was established in 2014 to provide a voice for the community energy sector, primarily in England. Membership totals over 270 organisations. Many of the member organisations are community energy groups, but membership extends across a wide range of organisations that work with and support the community energy sector.

www.communityenergyengland.org

Appendix

This was submitted by email separately

“I received the communication below from Dr Janet Moxley today (as part of a correspondence with her MP about the Energy Bill.) I quoted her in my consultation response. She evidences my point that a local community energy organisation will dedicate a significant proportion of its community benefit fund towards energy and energy efficiency/fuel poverty projects thereby increasing the climate benefit of the wind project as well as delivering cost savings and well-being improvements to residents.

I have edited the email to leave the parts relevant, particularly, to the community benefit questions in the consultation.”

From Dr Janet Moxley, Chair, Auchrobert Community Energy Society to Dr Lisa Cameron MP

“... [research by consultants Aquaterra](#) suggests that community energy in Scotland delivers 34 times more community benefit than commercially developed energy. To reinforce this point here is a list of community benefit grants awarded in the last year by the two organisations I'm involved with:

[Spirit of Lanarkshire Wind Energy Coop](#)

SOLWEC Community Grant Fund

- The Kilbryde Hospice - £20,000 for solar panels.
- St Mary's for All SCIO, Hamilton - £15,000 for energy efficiency measures.

- Healthy Valleys - £10,000 for solar panels on their active travel hub.
- Community Links (S Lan) - £9,250 for energy-saving appliances for low-income households.
- Climate Action Strathaven - £7,500 to publicise their community-run 10C bus service to Glasgow.
- Stonehouse Business Association - £6,000 for an energy efficiency advisor.
- Outlet Play Resource - £5,000 for an outdoor play project in Lesmahgow.
- Climate Action Strathaven - £5,000 towards a project officer and running costs for their community fridge.
- Darvel Area Regeneration Team - £5,000 towards resurfacing the Waterlip path.
- Coalburn Miner's Welfare - £4,200 for an energy audit of their premises.
- Off-grid Communities, Clarkston - £2,750 for solar panels on their outdoor shelter.
- Verve, Darvel - £2,400 for a wildlife gardening project for disabled people.
- Strathaven Town Mill - £1,222 for LED lighting.
- Newmilns Regeneration Association - £1,004 for a thermal imaging camera.

SOLWEC Warm Spaces Support Scheme:

- Meikle Earnock Community Council - £3,500 for hot meals and snacks.
- St Marys for All SCIO, Hamilton - £900 for heating costs.
- Calderwood Baptist Church, East Kilbride - £1,500 for food and heating costs.
- Newmilns Regeneration Association - £1,159 for food and activities.
- Old Blantyre Parish Church - £3,500 for food and catering equipment.
- Hamilton Churches Drop-In Centre - £7,500 for food, heating and laundry facilities.
- Claremont Parish Church, East Kilbride - £1,685 for heating and wifi in their community cafe.
- Healthy and Active in East Kilbride - £3,000 for food and heating.
- Gilmour and Whitehill Parish Church, Hamilton - £5,000 for heating their community cafe.
- Healthy Valleys - £8,000 for heating, staffing, venue hire and workshops.
- Trinity Church, Hamilton - £2,400 for food, heating and equipment.

SOLWEC also made a special award of £65,000 in Oct 2022 to be split between East Kilbride Food Bank, Loaves and Fishes Foodbank, Clydesdale Foodbank and East Ayrshire Foodbank to allow them to help people struggling with the cost of living crisis, and further similar award of £42,000 in March 2023 which was split between East Kilbride Food Bank, Clydesdale Foodbank, East Ayrshire Foodbank, Hamilton Foodbank, Clyde, Avon and Nethan Foodbank and St Ninian's Foodbank.

Auchrobert Community Energy Society

- Climate Action Strathaven - £10,000 for a home retrofit training suite.
- Coalburn Homing Club - £500 towards the cost of transport insurance.
- Coalburn Knit and Natter group - £500 for wool to knit blankets for vulnerable people.
- Lesmahagow Community Council - £3000 for plants for a sensory garden at McKirdy Park
- The Rural Development Trust - £5625 for community events to promote active travel

(Not all of the available funding for this round was allocated, and some has been carried forward to future funding rounds).

Could I also ask that if you become aware of any groups in your constituency who are looking for funding you make them aware of the [SOLWEC](#) and [ACES Community Benefit Funds](#). For both

organisations the first priority for funding is projects which improve energy efficiency, allow community microgeneration or otherwise reduce greenhouse gas emissions, then projects which deliver wider environmental benefits and then other community projects. Full details of these funds including guidance and application forms are on the websites of the respective organisations. There will definitely be another SOLWEC funding round in Feb 2024 and an ACES one in May 2024, and there may be an additional round for one or both organisations in autumn 2023 (depending on energy prices and windspeeds). Details will be given on the websites and social media.

Once again, thanks for your time this morning and for your support for community energy.

Janet

Chair,

Auchrobert Community Energy Society.

