



Developing local partnerships for onshore wind in England

Department for Energy Security and Net Zero Consultation

Date: July 2023

The Country Land & Business Association (CLA)

The CLA is the membership organisation for owners of land, property and businesses in rural England and Wales. We help safeguard the interests of landowners, and those with an economic, social and environmental interest in rural land. Our 27,000 members own or manage around half the rural land in England and Wales and over 250 different types of businesses.

Key messages

- CLA is supportive of community engagement and benefit requirements that are proportionate to the size of the project.
- There should be an exemption from requirements for community engagement and benefits for projects with one or two turbines primarily intended to supply a farm or other nearby business.
- The principle of landowner developed and operated local power supply should be factored into revised government community engagement and community benefits good practice guidance.
- CLA agrees with the proposal in the consultation document to embed the principles of best practice in community engagement into national planning guidance
- CLA agrees with the proposal to update the existing Community Benefits Protocol <https://www.renewableuk.com/page/CBP>.
- It is important to retain flexibility in the system so that local communities can decide in discussion with local wind project developer the most appropriate form of community benefits rather than a prescriptive model.

Rural landowners and renewable energy

Many CLA members are involved in renewable electricity generation at various scales. There are two main categories:

- operating or leasing land for power generation from solar or multiple wind turbines for export to the grid;
- small scale deployment of one or two turbines aimed at self-supply and decarbonisation of an individual farm business or nearby business consumer

Some of our members were pioneers of wind energy in England in the 1990's and early 2000's and more got involved through the Feed-in-Tariff after 2010 – but since planning policy around onshore wind turbines tightened in 2015, few in England have been able to pursue it. Now that planning restrictions may be easing, and in the context of net zero and the need for businesses to decarbonise and manage costs, there is rising interest again in self-supply from wind turbines and in export of power at scale to the grid from wind farms.

However, from contact with our members, there is a third category which has increasing interest from rural landowners but which remains under-exploited:

- a 'landowner led' model where rural land is used for power generation and storage to serve the local community directly – 'locally generated, supplied and consumed'.

This could be through solar, but if planning restrictions are eased, it could equally be delivered through wind energy or through a combination of both – perhaps along with battery storage.

Rural landowners are diverse however and while many are supportive of increased renewable energy others have concerns about possible negative impacts on the landscape and wider community.

CLA's response to this consultation

This consultation is about improving engagement between communities and wind energy developers and improving the system of community benefits from onshore wind developments. CLA has limited recent experience from which to draw on these issues because national planning policy in England has meant there has been limited opportunity to develop onshore wind in since 2015.

Our members involvement in renewable power generation has tended to be either at small scales for self-supply to future proof their own operations; or at larger export to grid scales through leasing land to developers of solar farms. Opportunities for community involvement in small scale self-supply situations is limited and arguably unnecessary. It is much more significant for larger export to grid scale projects but here, although a landowner may have some input, community engagement and benefit would generally be led by the developer as part of their scheme design and planning application process.

CLA does not therefore answer each of the specific questions in the consultation on improving engagement processes and community benefits systems around onshore wind – these are best answered by developer and community representatives. However CLA does make general comments below from a rural landowner perspective on these two main consultation themes.

Engaging the community

Proportionality - Which onshore wind projects should require community engagement?

The planning process provides an opportunity for formal input into decisions, but additional community engagement by project developers can be beneficial to build understanding, dispel myths and address concerns. It is already common practice for many solar projects, but there are also examples from species reintroduction where community engagement forms part of the licence application.

CLA is not against community engagement on wind power projects, but proportionality should apply to any requirements. Proposals for multiple turbine wind farms are clearly very different from proposals for one, or possibly two, turbines to serve a farm or other rural business with wind power. Small farm based wind projects have less impact on landscape, transport and environment, and have limited scope for community benefit compared with larger multi-turbine projects. Any community engagement therefore should be proportionate.

CLA's view is that **proposals for up to two turbines to serve a rural business should be exempt from requirements for community benefits and community engagement** (over and above that which happens as part of the planning process anyway). Such smaller projects aim to future proof and decarbonise a business, not to serve a community. As noted in the consultation document, regulations currently require pre-application community consultation where the development consists of two or more turbines, or the hub height is 15 metres. CLA suggests this **requirement for pre-application community consultation should be amended to three or more turbines**. This will ensure that projects aiming to serve a farm business, which involve single turbines - or two smaller turbines instead of a single larger one – are not subject to disproportionate requirements for community engagement and community benefit which are required of multiple turbine wind projects aimed at serving a wider community or exporting to the grid. Proposals involving three or more turbines should be subject to levels of community engagement and benefit proportionate to the size of the project.

Landowners could supply their local communities with wind power

New wind energy development has been largely absent in England since 2015 but relaxations to national planning policy on wind are now being considered. Given the legislative changes on net zero in recent years and increased awareness of the need to act on the climate emergency and energy security, it is expected that wind power could be supported by the public and planning authorities in many areas.

With the push towards electrification, energy price volatility, weakness of rural power grids and lack of available grid capacity (meaning waits of up to a decade or more and high costs of connection and reinforcement), there is also growing interest from rural landowners in supplying their local communities with power directly, rather than generating to export to the grid. This could be from whatever technology suits the circumstances – including wind.

This '**locally generated, supplied and consumed**' model is different to the more usual models of 'single turbine for self-supply' and 'large scale commercial wind farm exporting to the grid' - but CLA feels it has merit and could be of interest to local communities and landowners if barriers to its achievement could be removed and the concept piloted.

Subject to appropriate guarantees on continuity of supply when the wind does not blow and controls on issues such as pricing, it could be landowner led and commercially run and, like

larger wind farms, could have a degree of shared ownership if the community and landowner wish and the economics allow. There is interest from CLA members in such approaches, but there are barriers to the creation of such 'local grids'. Support would be needed from Distribution Network Operators (DNOs) and the regulator OFGEM as well as acceptance of the model by local communities and planning authorities.

CLA advocates that the principle of landowner developed and operated models of local power supply be factored into revised government community engagement and community benefits good practice guidance

<https://www.gov.uk/government/publications/community-benefits-and-engagement-guidance-for-onshore-wind> so that potential for its future deployment can be considered alongside the other more traditional models of wind energy development.

Consultation Question 1: Embedding best practice engagement into planning guidance

CLA agrees with the proposal in the consultation document to embed the principles of best practice in community engagement into national planning guidance. Best practice guidance will help project developers plan effective community engagement which will help secure not only stronger local support for wind energy projects but will also provide guidance to ensure these developments function in the most beneficial way for the local communities they will serve. Best practice guidance should help parties achieve a balanced engagement process and make clear the responsibilities of the community as well as the developer and clarify the boundaries of engagement ie. the extent to which the project can be influenced.

Consultation Question 4: Main barriers to effective engagement

Barriers to effective community engagement can stem from a lack of trust between communities and developers and a lack of community understanding of project details. These issues can be addressed by ensuring that community engagement (in whatever form) accurately explains all stages of the process to local communities at an early stage, particularly in respect of the construction stages of a project. In addition, ensuring transparency and availability of specialist reports like noise impact assessments or traffic surveys (which would be required as part of a planning application anyway) will be important to addressing community concerns, avoiding potential objections and will help to garner local support at an early stage. Governance structures such as having independent facilitators to oversee process and manage meetings can improve effectiveness.

For smaller projects, the problem is likely to be costs, resources and knowledge of how to do a robust engagement process. Good practice guidance will help here, but as stated above, it is **essential that requirements for community engagement are proportionate to project size.**

Consultation Question 5: Gaining community support for onshore wind

If community engagement is transparent and clear about the benefits an onshore wind project could bring to an area, as a source of clean energy as well as possible other community

benefits, it will contribute to gaining not only community support, but also sense of local pride in being part of a community whose energy needs are met largely by a local generation project. This would be particularly so if a local landowner led scheme could result in cleaner, cheaper and locally generated energy being reliably available to local communities. As long as this is communicated effectively from the early stages of engagement, this should help to gain community support for onshore wind projects.

Community benefits

Consultation Question 7: Updating the Community Benefits Protocol

CLA agrees with the proposal to update the existing Community Benefits Protocol <https://www.renewableuk.com/page/CBP>. The protocol dates from 2013 and is not reflective of new approaches such as energy bill discounts given to consumers by companies like Octopus Energy through their 'Fan Club' <https://www.octopusenergygeneration.com/fan-club/>. Also, CLA outline below two possible forms of energy related direct community benefit which we suggest are worthy of consideration for inclusion in both the Community Benefits Protocol and the government's Best Practice Guidelines for Community Benefits and Community Engagement. These suggestions are 'local tariffs' and 'vouchers for low carbon property level investment'.

Consultation Questions 8 – 10: Flexibility is important for local communities and project developers to decide the most appropriate form of local benefit

CLA believes that it is important to retain flexibility in the system so that local communities can decide in discussion with local wind project developers what the most appropriate form of community benefits, and delivery arrangements for them, should be for their local area. This flexibility can allow new and innovative forms of community benefit to be created and two examples of this are given below.

Local Tariffs

In line with CLA's suggestion above of local landowner led models of local power generation and supply, potential benefits should recognise community benefit via '**local tariffs**' - if it can be shown that supply of power direct to a local community from a local wind project can be achieved at prices consistently lower than those charged for 'standard' grid imported power. Any such wind based project would have to incorporate a retained 'balancing' partner – a power retailer to ensure continuity of power supply to consumers when the wind does not blow. However with this in place the Distribution Network Operator (DNO) could monitor the imports and exports from the local grid and charge as appropriate, when the electricity is imported from elsewhere or exported to the main electricity grid.

Vouchers for property level low carbon investment

Another possible form of community benefit could be for a share of ongoing revenue from larger wind projects to be held on behalf of the local community and drawn down by them as '**vouchers**' redeemable against the cost of other low carbon investment at the individual

property level. This could be towards the cost of solar or battery storage installation, or towards the cost of electrical upgrades required when this equipment, or electric heat pumps or car charging points are installed. This approach would help to accelerate decarbonisation in the wider rural community and create more energy resilient rural communities.

This 'voucher' approach could be used not only to benefit communities directly hosting a new wind farm but also proportionately deployed to benefit communities along the route of new network infrastructure installed through rural areas to connect large wind farms into the transmission or distribution networks. This would provide tangible benefit to communities which otherwise get no benefit from being host to new pylon lines installed to facilitate the connection of distant wind farm to the grid.

Consultation Question 11: Challenges faced by communities and onshore wind developers when designing and implementing community benefits

Community benefit in the form of consistently lower priced power from a local wind farm developed by a local landowner does face barriers. The support of network operators and their regulator OFGEM would be needed. The model envisages a community – landowner, local residents and businesses – being enabled to utilise a local substation network so that a landowner could put generation on to it and local consumers can draw power from it, all without incurring network Distribution Use of System (DUoS) charges currently levied by the DNO. All consumers would need to have a smart meter to enable 'dynamic management' of all the electricity transfers.

There would also be up-front costs associated with local network engineering work required to achieve what would effectively be a 'local grid'. However these would likely be far less than those otherwise required to reinforce the wider distribution network to accommodate a similar sized generation project if its revenue model was to export the power on to the distribution network.

The overall concept would need to be trialled as a pilot project with an interested landowner, community and network operator before being taken forward, but CLA feels the 'local grid' model could be part of a future more resilient decentralised power network in rural areas.

For further information please contact:

Graham Clark
Senior Land Use Policy Adviser
CLA, 16 Belgrave Square
London SW1X 8PQ

Tel: 020 7235 0511
Email: graham.clark@cla.org.uk
www.cla.org.uk
