

# RTPI response to the Department for Energy Security and Net Zero consultation on ‘Developing Local Partnerships for Onshore Wind in England’

*July 2023*

This is the RTPI’s response to the Department for Energy Security and Net Zero’s consultation on [‘Developing Local Partnerships for Onshore Wind in England’](#).

## About the RTPI

The Royal Town Planning Institute (RTPI) champions the power of planning in creating sustainable, prosperous places and vibrant communities. We have over 27,000 members in the private, public, academic, and voluntary sectors. Using our expertise and research we bring evidence and thought leadership to shape planning policies and thinking, putting the profession at the heart of society's big debates. We set the standards of planning education and professional behaviour that give our members, wherever they work in the world, a unique ability to meet complex economic, social environmental and cultural challenges.

## Consultation questions and responses

### Engaging the community

**Q1. Do you agree with the proposal to embed the principles of best practice engagement into planning guidance?**

The RTPI has long argued that onshore wind should play a greater role in the nation’s energy mix. Given this and viewed alongside greater flexibility for LPAs in identifying suitable sites for onshore wind within their boundaries, we agree that embedding the principles of best practice in Planning Practice Guidance would be a step forwards.

However, the principles listed should apply to all forms of development, including other forms of low-carbon energy infrastructure, not just onshore wind. Communities across England are concerned that decisions about new developments in their areas are being made for them, not with them. As we discuss below, evidence suggests that this sense of procedural injustice is a



key driver of opposition to new homes and infrastructure that the country needs to achieve a range of national priorities. These include net zero and the wider infrastructure required to get the most out of an energy mix that draws more heavily on onshore wind, such as battery storage and new grid infrastructure (see the RTPI's 2019 report [Planning for Smart Energy](#)). Applying these principles in government guidance to all forms of development would help start to address this.

Further, applying these principles to 'standard' approaches to consultation should be regarded as a minimum for effective engagement, not standard practice. A large body of academic research suggests that more thorough approaches could more effectively secure community support for renewable energy projects ([Firestone et al., 2018](#)). As we discuss in more detail in response to Q2, these include the following approaches, which can be undertaken separately or in combination where appropriate and led by a commercial developer or community enterprise.

- 'Participatory' approaches to project development in which communities have a genuine say at the 'options' stage – in other words, they are consulted on the types of projects that developers bring forward, and not just the details of schemes which have already been fixed by developers, and;
- The shared ownership of projects, in which communities have a direct financial stake in the success of new onshore wind schemes.

## **Q2. What other ways are there to improve community engagement when onshore wind developers consult with the local community?**

Embedding the seven principles in Planning Practice Guidance would be a positive step, but evidence suggests that going beyond traditional forms of consultation to give communities a genuine say in the development process from the 'options' phase of project development would lead to greater community support and more efficient delivery ([CSE, 2017](#)).

Very broadly, the degree of community influence over onshore wind projects can be considered at three distinct levels. These are:

### *1. Doing 'standard' consultation effectively*

This is what the principles encourage. We consider them to represent an improvement on the current approach to consultation most often taken today and welcome the reference to engagement across the lifetime of the site, as this can influence the acceptability of repowering wind farms. However, we would caution that developers may apply these engagement principles as a 'box-ticking' exercise, especially in the absence of specific standards for engagement.

Policymakers should ensure that standard approaches to consultation are reflective of the whole community, not just a narrow demographic. Developers should proactively engage with hard-to-reach groups (including youth, the elderly, time-poor, those who lack internet, speakers of languages other than English, those with poor literacy, etc.) who will be affected by proposals. Although previous RTPI research, ['The Future of Engagement'](#), has shown that the pandemic has accelerated the shift towards greater digital engagement, focusing wholly on



digital methods omits certain sections of society and cannot replace face-to-face engagement that fosters a more authentic relationship.

The RTPI therefore recommends that policymakers set outcomes-based standards for community engagement which require developers to engage with a minimum number of people who comprise a representative sample of the community affected by their proposals.

## *2. Greater use of participatory approaches at the 'options' stage of project development*

However robust 'standard' approaches to consultation can be, the concept of 'partnership' between onshore wind developers and communities is flawed in that the power relationship between applicant and community is not one of equals.

Meaningful consent is much more than simply commenting on someone else's proposal. In a genuine partnership, those impacted must be able to articulate their needs and shape the options for projects coming forward before proposals are set in stone.

For example, the Centre for Sustainable Energy's (CSE) ['Future Energy Landscapes Guidance'](#) emphasises the importance of communities 'owning' workshops, allowing them to consider different options and provide feedback with autonomy. This approach to engagement encourages participants to develop and scrutinise options for wind projects based on their own knowledge as well as evidence and arguments presented by others.

There are several studies and real-world examples of how this can be efficiently done in practice to the benefit of both developers and communities, including:

- CSE and CPRE's [Future Energy Landscapes](#) project research introduces a new deliberative community engagement methodology based around two workshops separated by a phase of reflection, which successfully trialled in Congresbury, Somerset and Moreton in Marsh, Gloucestershire.
- Building on work from CSE, a [report by CPRE on their Community Visioning Process](#) provides a framework for how communities can collectively determine where to appropriately integrate renewable energy into their local landscapes. Three workshops provided residents across various parts of the community with the opportunity to highlight their local knowledge of the landscape and explore a range of suitable options. The articulation of a community vision provided residents with a powerful tool for future decision-making.
- ClimateXChange's study, ['Involving communities in deliberation: A study of three citizens' juries on onshore wind farms in Scotland'](#), concluded this process can allow citizens to grasp complex debates, thereby adding value to the process.
- A developer building [an extension of Berry Burn Wind Farm in Moray](#), Scotland liaised with the community in the options stage of the development and revised proposals in response to feedback around improving biodiversity within the site to repair damage caused by wildfires and to mitigate the risk of future ones.

Officials in DNZES should work with colleagues in DLUHC to ensure that planning guidance should make clear that developers should demonstrate that they have provided opportunities for participatory engagement at the 'options' stage of development where possible. This should not only apply to onshore wind project.



### 3. Shared ownership

Shared ownership represents a deeper level of community involvement in projects and can complement the approach described above where appropriate.

Shared ownership enables a community group to become a financial partner of a local wind project. Typically, shared ownership projects fall under three categories:

- Joint venture, in which a community group and developer collaborate to develop and steward a wind farm;
- Shared revenue, in which a community group buys the rights to a future revenue stream; or
- Split ownership, in which a community group buys, or is given as a form of community benefit, a proportion of an onshore wind project.

Shared ownership provides a way for communities and developers to work collaboratively and constructively for mutual benefit, including, for communities, a direct share in the profits of a project which can be used flexibly to address local issues. Communities benefit from the commercial expertise of developers but have true agency and a sense of ownership over the project, which evidence shows often minimises opposition to wind projects.

A large body of academic research has demonstrated links between positive public attitudes to onshore wind in the UK and community ownership, for example Warren and McFadyen's (2010) research, '[Does community ownership affect public attitudes to wind energy: A case study from south-west Scotland](#)'.

The UK government has previously shown support for shared ownership for these reasons. The Department of Energy and Climate Change itself laid out in 2015, in response to the Shared Ownership Taskforce's 2014 report:

*"...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."*

Though this model has seen little progress in England, Scottish guidance on onshore wind encourages a community shares approach, where local organisations and individuals are provided an opportunity to invest in the project, with any offer additional to a community benefits fund.

The [Sallachy Wind Farm](#) provides an example of a successful approach to shared ownership. The German wind energy company WKN approached the local community early in the design process and requested that Local Energy Scotland give its community partners impartial advice and support in discussions about the shared ownership opportunity. An information event was then held about the Scottish Government's Community and Renewable Energy Scheme (CARES), during which a community group was chosen out of the five participating groups that was felt to have the best staff resources and business premises to lead the project on behalf of all of the five communities.

A CARES grant subsequently provided funding for professional legal and financial advice, which enabled the community to negotiate a Memorandum of Understanding with the developer to formalise the shared ownership agreement. In addition, the developer committed to ensuring that economic benefits are kept within the local area through a preferential Highland-wide local procurement policy.

England's tallest wind turbine, located outside Bristol at Lawrence Weston, also exemplifies the merits of community ownership. The recently completed turbine will supply power to 3,000 homes and is expected to generate upwards of £100,000 a year for Lawrence Weston. This project was initiated at grassroots level by residents from a deprived housing estate and is thought to be the first regionally funded community energy scheme in the country, thus providing key learning opportunities for future projects.

Policymakers should publish a policy statement for onshore wind that sets out the ambition for shared ownership to be offered as standard on all new onshore wind projects, including repowering projects. Accordingly, the government should publish guidance on good practice principles for developers, communities, and local authorities that wish to pursue shared ownership projects.

It is important to note that whilst the shared ownership model brings significant potential benefits for both individual projects and the national energy transition, it does rely on a level of skill and capacity which may not be present in all communities. As such, government guidance should stipulate that impartial advice should be provided to enable all parts of the community to maximise the opportunities afforded to them by this approach. Scottish guidance provides a good example of how to apply this in practice.

#### *Overall*

Overall, evidence indicates that planning guidance should aim to move as many schemes as possible from doing traditional consultation well to offering opportunities for participatory engagement and shared ownership where this is appropriate.

Methods of engagement that involve communities in determining the location, design, and financial structure and benefits of projects have been shown to generate greater community support. And ongoing engagement over the life of a wind farm can also help establish support to repower or extend its operational lifetime.

Shared ownership projects may require more upfront time and investment to establish a working relationship between a community and developer, but such proactive engagement increases certainty that the community and local authority will support the project in the planning process. This significantly de-risks wind projects and makes them less likely to face planning delays, which reduces costs and increases speed later in the process.

Promoting shared ownership in national policy is also crucial for the country's overall energy transition. The political backlash against onshore wind which precipitated the current nationwide moratorium on new project was, in part, a reaction to insufficient public engagement in many places, and in part a lack of a connected national conversation about what net zero means in practice.

As discussed in more detail below, officials in DNZES should work with colleagues in DLUHC to explore how planning law could be updated to allow certain types of community benefits that

relate to the community ownership of onshore wind projects to be considered as material in planning decision.

**Q3. Are there other methods of engagement between developers and local communities that should be considered best practice?**

See above.

**Q4. What are the main barriers to effective engagement between local communities and developers?**

*Timing of engagement / loss of trust*

If the developer does not undertake early engagement, communities may lose trust in the project; subsequently, communities are likely to feel that they have been unable to have a real influence on the design of the project or that the project has been imposed on them.

As Regen assert in their [Briefing Note](#):

*“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.”*

To this end, developers must engage as early as possible as this directly determines the trajectory of a project, with research from Harper et al (2019), [‘Onshore wind and the likelihood of planning acceptance: Learning from a Great Britain context’](#) highlighting:

*“...the need to consider the influence of local communities within the proposals of onshore wind projects and understand characteristics which may be associated with project rejection.”*

*Awareness*

Effective engagement must involve as many members of the community as possible, including both community leaders and hard-to-reach groups. This aligns with our [ongoing call](#) for both digital and in-person engagement to be incorporated, catering to the needs of all.

As discussed below, communities should be supported in understanding opportunities available through community benefit funds throughout the life of the wind farm. To ensure a fair approach, developers should provide support to all members of the community to ensure they understand how to access the benefits available.

Education about the community’s role in addressing the climate crisis should underpin engagement strategies. It should be clear to communities how any potential wind project in their area would contribute towards achieving energy security and net zero targets at the national level.





### *Responding to community feedback and requests*

High quality engagement should demonstrate how community feedback is captured and used. There is a risk that consultation is treated as a box-ticking process, especially when developers are under time pressure, which can lead to a breakdown of communication.

Local residents who take the time to engage will undoubtedly want their input recognised and acknowledged. Ensuring that communities understand the results of engagement and how the project may have been revised accordingly strengthens accountability and trust.

### *Long-term engagement*

Engagement is frequently only sought and considered during the planning process. Nevertheless, ongoing engagement over the lifetime of the project is essential in ensuring the community continues to benefit from the project.

Ongoing engagement over the operational lifetime of a wind farm is crucial with respect to increasing and influencing the acceptability of repowering wind infrastructure: a critical part of meeting the UK's net zero target. Indeed, repowering a site brings key economic, commercial and logistical advantages over constructing new sites, as highlighted by [Energy Monitor](#). As many operating wind turbines reach the end of their time-limited planning consent of 25 years, repowering will become ever more significant.

### *Power imbalances*

Partnerships are rarely equal in terms of power and knowledge, with developers possessing technical knowledge and insight that may deter local resident participation. Engagement should therefore be pursued in a clear and accessible format that seeks to empower communities.

Power is also unevenly distributed within the community. Engagement should therefore provide equal opportunities for diverse groups to participate, with full regard to protected characteristic groups and the usually silent majority.

## **Q5. How can effective community engagement help to gain community support for onshore wind?**

There is a wide and global body of academic literature finding a statistically significant effect between participatory and deliberative engagement methods and community support for onshore wind projects (see Firestone et al., 2018, '[Reconsidering barriers to wind power projects: community engagement, developer transparency and place](#)').

Indeed, a 2021 BEIS research note, '[Net zero public engagement and participation](#)', commented that public engagement can provide a social mandate for action on net zero, noted that:

*“... multiple studies have demonstrated that whether the public accepts a decision or policy depends on whether or not the decision-making process is perceived as fair. In relation to climate change, examples include the siting of wind farms and other energy infrastructure.”*



The Institute for Government summarises in [‘How to design an infrastructure strategy for the UK’](#) how effective community engagement can improve decision making on new infrastructure projects by:

- Preventing ‘information wars’ in which campaign groups and political parties face incentives to draw on partial evidence to support pre-determined positions.
- Reducing local opposition and the ‘concentrated losers’ problem by helping local communities to think more broadly about the collective benefits of investment and construction.
- Giving members of the public who support contentious projects a voice.
- Giving communities a say early in the policy process and reducing a sense of top-down policy imposition. Early engagement can reduce the burden later in the decision-making process when time can be tighter. A sense of procedural fairness is also often more important than transactional fairness (e.g., levels of financial compensation) in reducing local opposition to major projects.

The Institute for Government provide the example of the [French ‘Commission Nationale du Débat Public’](#) (CNDP) model of how this can work in practice, and tangible benefits it can bring to infrastructure delivery.

The CNDP is a state-sponsored public body tasked with promoting genuine engagement around project options. This approach emerged in response to severe public opposition to state-sponsored infrastructure projects and was initially focused on major and contentious projects but is increasingly being adapted to renewable energy. Significantly, CNDP public debates occur before a project has been planned in detail, providing the local community with direct input into the principle and location of development.

[Evidence](#) indicates that this model has reduced local opposition to strategically important infrastructure projects and increased the ability of communities to shape decisions (Slade and Davies, 2017). The Institute for Government’s research cites Arup’s conclusions that the CNDP ‘provides a much-needed remedy to help overcome the difficulties caused by mobilised campaigns and opposition to infrastructure consenting.’

## **Q6. Are there ways community support for onshore wind can be defined?**

Community support, as the term is used in the current version of the NPPF, is extremely hard to define and demonstrate.

Fundamentally, however, if a) applicants and planners adhere to the principles/approaches laid out above (and ideally exceed them by directly involving communities in decision making on new projects), and b) the wider planning system functions as intended, **community support should be indicated by the allocation of wind farm sites in planning policy and, ultimately by onshore wind projects receiving planning permission.**

This may not be community support in the sense of direct democracy (i.e. individuals directly participating in decision making process themselves and stating their support) but is in terms of representative democracy (i.e. elected representatives making decisions on behalf of, and in the





interests of, their constituents, having taken their views into account – in this case, councillors on a planning committee deciding planning applications), upon which the planning system is built.

Though it is usually impossible for all groups within a community to be ‘won over,’ if the granting of planning permission does not indicate community support in this way, it raises fundamental questions about its legitimacy and effectiveness.

It is also odd that this particular form of sustainable energy infrastructure should be required to demonstrate greater community support than other forms that receive permission through the same planning regime.

For these reasons, and to encourage the roll-out of new onshore wind projects, the government should remove footnote 54 of the NPPF and put onshore wind projects on the same planning basis as other renewable energy developments.

## Community benefits

### **Q7. 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?**

In principle, we agree with the Community Benefits Protocol being updated to include innovative and emerging schemes. However, while the evidence does suggest that well-designed, proportionate and directed community benefits can build long-term support for new onshore wind developments:

- Strong community benefits cannot build support for schemes if they are not accompanied by effective community engagement, and;
- The government should consider updating the Newbury Principles so that some kinds of community benefits – including shared ownership and the retrofit of buildings in the same locality as (but not directly related to) the development for which permission is being given – can be considered material in planning decisions.

We unpack each of these issues in more detail below.

*Strong community benefits cannot build support for schemes if they are not accompanied by effective community engagement.*

This is needed for communities to shape schemes so that they are as effective as possible, understand the benefits of schemes that have already been implemented in their area, and most significantly, gain a sense of procedural fairness. Without this, there is a risk of communities feeling they have been ‘bought off’ by benefits (Knauf and le Maitre, 2023, [‘A matter of acceptability? Understanding citizen investments schemes in the context of onshore wind farm development’](#)). The Protocol should make this clear.

The government should consider updating the Newbury Principles so that some kinds of community benefits – including the retrofit of buildings not directly related to the development for



which permission is being given and community ownership – can be considered material in planning decisions.

The government has said that it does not intend to change the fact that community benefits cannot be a material consideration in planning decisions. This relates to the Newbury Principles, which are that decisions (and conditions relating to decisions) must:

1. Be imposed for a planning purpose;
2. Fairly and reasonably relate to the development for which permission is being given; and
3. Be reasonable.

We strongly support the stance that, for the integrity of the system, the principle that planning permission should not be bought or sold should be maintained in all cases.

However, we would also argue that there is a convincing case for an expanded understanding of the Newbury Principles and, through this, for *some* types of community benefits to be considered material during planning decisions. This would be in line with current understandings of the purpose of planning, the role of the planning system and individual developments in driving a system-wide shift to net zero, and the perspective of the public on these matters. For example:

- Community benefits in the form of the retrofit of buildings not directly related to the development being permitted cannot currently be considered material to a planning decision on that development. But retrofit is clearly directly concerned with the built environment and place making across the wider environment in which a new onshore wind development is situated. And even when these retrofit schemes do not immediately relate to the development being permitted, they can concern the systematic improvements to building fabric that would lower an area's burden on the energy system and therefore directly relate to supply-side responses which include onshore wind.
- As the Supreme Court [recently reinforced](#), offers of shared ownership of new onshore wind projects cannot be considered by Local Authorities as material to an application. But the economic development and the long-term stewardship of significant infrastructure are core concerns of the planning system, and communities understandably see these issues are core concerns.

Government should consider how planning law can be brought up to date so that community benefits which more closely align with the now established view of what is material to planning, which derives from the three pillars of sustainable development rather than the narrowly defined scope of Newbury, could be considered within the planning process.

Other types of community benefits, which less directly concern improvements to or the stewardship of the built environment, and more directly concern benefit individuals, such as electricity bill discounts, should remain immaterial to planning decisions (this should not preclude them from being parts of community benefits packages, however).

**Q8. How is the current system for community benefits from onshore wind working? Can it be improved and, if so, how?**

Due to the restrictiveness of current national policy on onshore wind in England, very few projects have come forwards in recent years, with only 50mw of onshore wind capacity coming online since 2018, compared to 1.2gw in Scotland and 230mw in Wales. This downward trend makes it difficult to judge how effective the current system for community benefits is in England specifically.

The RTPI therefore supports Regen and the Centre for Sustainable Energy's calls for footnote 54 of the NPPF to be removed. Research conducted by the former ([Planning reforms for onshore wind](#)) has highlighted the degree to which these tight restrictions have impinged on the delivery of onshore projects, with the pipeline of approved projects 'near empty'.

Crucially, as found by Walker et al. (2014) in their paper '[Community benefits, framing and the social acceptance of offshore wind farms: An experimental study in England](#)' and furthered by [Regen's recent briefing note](#), the balance of evidence (particularly from Scotland), suggests that well-designed community benefit funds can increase local acceptance of onshore wind projects. This correlation must, however, be caveated in that acceptance is greatest when communities have more control over how projects and funds are developed, the purpose of such funds is clearly explained, (refer to Walker et al., 2014), and examples of the positive impacts of funds over time are presented to communities. In other words, the community benefits system is most likely to effectively build local support for onshore wind when it comes with a sense of procedural fairness. Effective engagement (separately, on both onshore wind and for these funds) and community benefit funds are closely linked.

While the factors that determine this sense of fairness can vary greatly between projects and places, (see Philpott and Windemer, 2022, '[Repower to the people: The scope for repowering to increase the scale of community shareholding in commercial onshore wind assets in Great Britain](#)') this does suggest that the system could be improved by putting a stronger emphasis on engagement within the community benefits protocol, and encouraging developers to undertake more collaborative and co-creative methods for consultation.

**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?**

Again, the lack of new onshore wind projects in England makes this question difficult to answer with particular reference to that nation, and across the UK, the composition and success rates vary (see above) but can be positive.

More generally, evidence points to the visual impact of onshore wind developments as one of the key reasons for communities' opposition to new schemes, as explored by Johansson and Laike (2007), '[Intention to respond to local wind turbines: the role of attitudes and visual perception](#)'. This suggests that well-designed schemes that both offset the visual impacts of new infrastructure and proactively improve the local environment (for example, through the provision of green infrastructure) should be incentivised.



**RTPI**

Royal Town Planning Institute

In addition, for the reasons earlier stated, and learning from the experience in Scotland (see Aquatera research '[Community owned wind farms have paid their communities 34 times more than commercial counterparts](#)'), the RTPI would support the take-up of shared ownership models.

**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?**

Please see our responses above.

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

No comment.

## **Analytical annex**

**Q12. 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.**

No comment.

**Q13. 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.**

No comment.