

Response ID ANON-93DB-6G4S-P

Submitted to Community Benefits and Shared Ownership for Low Carbon Energy Infrastructure
Submitted on 2025-07-16 21:54:05

About you

What is your name?

Name:

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What is your organisation?

Organisation:

Rural Services Network

Which of the below options best represents you/your organisation?

Other

If other, please specify :

Membership organisation - Special Interest Group of the LGA representing rural local authorities

We usually publish a summary of all responses, but sometimes we are asked to publish the individual responses too. Would you be happy for your response to be published in full?

Yes

How did you hear about this consultation?

How did you hear about this consultation?:

Email from elsewhere

Other (please specify):

Community benefits: Proposal

1 Do you agree with the principle that developers must provide community benefit funds?

Agree

Please explain why/why not:

Yes. RSN agrees that developers should be required to provide community benefit funds, for the reasons set out on pages 11-12 of the paper. We therefore support the proposal for the current voluntary approach to be converted into a mandatory scheme.

We also believe that the proposals outlined in this paper should be implemented much more rapidly than is envisaged. There is a risk that schemes will be agreed in the interim period covering a significant amount of suitable sites which ultimately will result in rural communities not benefiting from the proposals within this paper.

Community benefits: Scope

2 Considering the policy parameters for the scope proposed, what types of low carbon energy infrastructure should be included within the scope of the policy?

Please provide reasoning for your answer :

We believe that all types of low carbon energy infrastructure should be included within the scope of the policy, to ensure that all communities which are hosting such infrastructure receive benefits in return, in line with the objectives set out on pp. 11-12 & 15 of the paper.

3 What would be the impacts on specific low carbon energy infrastructure technologies of bringing them into the scope of this potential scheme?

Please provide reasoning for your answer:

4 Do you agree that there needs to be provision for amending the scope of the policy in future to ensure that it can be adapted to fit future technological changes?

Agree

Please provide reasoning for your answer:

Yes – as technology advances and new options may be available, there should be provision for keeping pace with that change to ensure that it can be adapted to fit future technological changes and to ensure that it meets the objectives of ensuring that communities benefit from the energy infrastructure within their areas.

5 Do you agree with the approach outlined for the provision of community benefits for co-located infrastructure?

Not Answered

Please provide reasoning for your answer:

Community benefits: Thresholds

6 Do you agree with the proposed mandatory community benefits threshold of 5MW for power generating and storage assets?

Not Answered

Please provide reasoning for your answer:

7 Should the threshold vary by technology in order to accommodate nascent technology (such as floating offshore wind)?

Not Answered

Please provide reasoning for your answer:

8 How should shared ownership arrangements interact with any mandated community benefit fund contributions?

Please provide reasoning for your answer:

9 Are there any project types that should be exempt from a potential mandatory community benefits scheme?

Yes

Please provide reasoning for your answer:

We agree with the proposal on p.18, that 'community energy projects be exempt from any mandatory requirement to provide a community benefit fund.' More generally, it seems sensible that any low carbon infrastructure projects that are genuinely funded and operated by the local community itself, and whose benefits already accrue to that community, should be exempt from any mandatory community benefits scheme. For maximum clarity, we think there will need to be a clear definition of what is meant by a 'community energy project'.

Community benefit: Level of benefit

10 For those developers already offering community benefits on a voluntary basis, how are these funded?

Please provide reasoning for your answer:

11 Recognising the need for flexibility, are there any impacts or considerations of funding community-led projects that should be taken into account?

Please provide reasoning for your answer:

12 Do you foresee any challenges for developers to fund mandatory community benefits? Does this differ between technologies?

Please provide reasoning for your answer:

13 How can significantly larger community funds be best managed (requirements to use regional funds, introduction of a cap on funding, limit on cap duration)?

Please provide reasoning for your answer:

14 Do you have a preference for either of the proposed methods for calculating the level of contribution payable in respect of energy generating stations (i.e. by reference to either installed capacity or generation output)? Are there any further considerations relating to either option which require exploration?

Please provide reasoning for your answer:

15 Do you agree with the principles of seeking to enable combining funds and utilising regional funds?

Agree

Please provide reasoning for your answer:

There may be certain instances where combining funds and/or utilising regional funds may be appropriate depending on the nature of the project. This should only take place where the local community representatives are in agreement.

16 Do you agree with the outline proposals for a) when payments apply, b) index-linking, c) changes to project lifespan/capacity/ownership, and d) suspension of payments?

Not Answered

Please provide reasoning for your answer:

17 Do you agree with the proposals to place the developer obligations for community benefits on the relevant licence-holder (e.g. a licence for generation of electricity under the Electricity Act 1989)? Are there any further considerations that should be taken into account regarding ownership and change of project ownership?

Not Answered

Please provide reasoning for your answer:

18 Are there any other aspects on funding that should be considered?

Please input your answer below:

Community benefits: Use of funds

19 Do you agree or disagree that we should not produce prescriptive guidance on what the fund can be used for? Are there any other factors that should be considered?

Agree

Please provide reasoning for your answer:

We generally agree with the proposals in relation to what the funds should not be used for and it will be for the community to decide on its local priorities. However, whilst the funds should not be used to deliver or replace funds for statutory services, there may be discretionary services no longer provided by local authorities due to funding constraints which the community representatives feel would benefit the community for example community transport schemes which should be allowed.

Community benefits: Administration

20 Do you agree with the suggested roles and responsibilities defined for the developer, fund administrator, administrative body, community representatives and community, and with the proposed governance structure? Would you suggest any amendments?

Agree

Please provide reasoning for your answer:

The role of the 'Fund administrator' appears to be significantly more than that of an administrator of the funds but has a key role in enabling the community engagement, a key element to ensure widespread community agreement to the proposals. The ACRE network has significant experience in administering funds for example through their work on the Rural Housing Enabler Programme where the Rural Housing Enablers are the ones that broker the community engagement and bring different parties together as part of negotiations. There could be benefit in separating these roles recognising the different skill sets, depending on the resources required to do this.

21 Do you agree that some flexibility in the governance structure is needed? If yes, do you think that the suggested 'truncated' governance approach would adequately capture and reflect the needs of smaller funds or communities with less capacity?

Not Answered

Please provide reasoning for your answer:

22 Do you agree with the proposed approach to the decision-making process?

Agree

Please provide reasoning for your answer:

We generally agree with the proposed approach but would question how disputes are resolved in relation to two differing community groups wanting conflicting projects to be awarded funds, who takes precedence, is it the Parish Council or a Community Group that may have conflicting proposals. Is there a hierarchy of community groups involved?

This is most relevant for example if the truncated governance approach has been adopted to ensure that the use of funds generally meets the needs of the community.

23 Do you agree with the deadline of one year before payment is due for having governance structures in place?

Not Answered

Please provide reasoning for your answer:

24 What would be an appropriate cap on spending from the fund for administrative functions? What costs can you anticipate the fund structure would entail? What costs have you incurred in setting up voluntary schemes? Do you think we should set out a sliding scale for larger projects?

Please provide reasoning for your answer:

Community benefits: Defining communities, capacity and engagement

29 Do you think a case-by-case approach to defining the community is appropriate? Are there any other bodies or groups not listed on page 47 in the paper that should be part of the engagement process for determining eligibility?

Please provide reasoning for your answer:

We believe that a case by case approach to defining the community is appropriate and advice may be sought from the Local Authority in this regard who may know the area best.

There will be rural areas which naturally serve a wider hinterland area and which should be considered as part of the definition of a community.

30 Do you agree that capacity building will be required in communities? What do you believe this should look like and who do you believe is best equipped to carry this out?

Agree

Please provide reasons for your answers:

Yes, we believe that capacity building will be required in communities although there will be some areas that have for example had support over the years to produce neighbourhood plans where community groups may be more established. This will obviously be reduced in the coming years following the Government's decision to scrap funding for support for Neighbourhood Plans which was a good capacity building approach.

An audit to understand existing structures and community groups and areas of responsibility should be undertaken before starting community engagement work.

Organisations like the ACRE Network may be well placed to support the proposed capacity building work in communities across England due to their experience with engagement work and community consultation.

It should also be recognised that without additional funding, local authorities in rural areas may have little capacity to support this process. Urban Councils receive 40% more in Government Funded Spending Power per head (in 25/26) compared to rural councils and this can impact their ability to deliver services.

31 Do you agree that capacity building and engagement should be funded by the community benefit fund administration budget? What do you believe should be done in cases where the administrative cost of capacity building and engagement initiatives are too costly for smaller-scale projects?

Agree

Please provide reasoning for your answer:

Yes, we agree that capacity building and engagement should be funded from the administration budget although there is a risk that communities needing more support, will find more of their allocated funds used for this rather than for the actual community benefit projects. The situation should be monitored to ensure that areas are not disadvantaged by this approach.

32 Do you agree community engagement should be led by the fund administrator? Do you believe our proposals have any unfair impacts on those with protected characteristics? If yes, which groups do you expect would be specifically impacted?

Agree

Please provide supporting evidence:

Yes the Fund administrator should ensure that capacity building and community engagement take place but this doesn't necessarily have to be delivered by the fund administrator, there may be others that have this expertise and can facilitate it within the community.

Shared ownership: Background

33 Are you aware of evidence which suggests that shared ownership has or has not delivered the benefits?

Please provide reasoning for your answer:

Please upload file if required to support your answer:

No file uploaded

34 Are you aware of any evidence to support other benefits of shared ownership for either communities and/or developers?

Please provide reasoning for your answer:

Please upload file if required:

No file uploaded

35 Are you aware of any risks arising from encouraging shared ownership schemes?

Please provide reasoning for your answer:

Shared ownership: Current landscape

36 What are the barriers to shared ownership in Great Britain?

Please provide reasoning for your answer:

The Government should learn from experiences in supporting shared ownership in Scotland and Wales to ensure the effective engagement of low income communities or those experiencing higher rates of fuel poverty. The fuel poverty gap in rural communities is significantly higher than in urban areas and these communities may need specific support to engage in shared ownership schemes.

37 Do certain communities face barriers to shared ownership more so than others?

If so, how and/or why?:

38 How can government ensure that low-income communities, or those experiencing higher rates of fuel poverty, are able to engage with shared ownership offers?

Please provide reasoning for your answer:

39 Do certain developers and/or particular sectors face barriers to shared ownership more so than others?

If so, how and/or why?:

40 Does a particular barrier represent more of a barrier to shared ownership than others?

If so, which and how?:

41 What actions can the government take to address these barriers and promote further uptake of shared ownership, particularly in England?

Please provide reasoning for your answer:

Analytical Annex

1 Do you agree with the rationale for intervention? Are there any points we have missed?

Not Answered

Please input your answer below:

2 Do you agree with the impacts that have been identified? If not, please explain why with supporting evidence.

Not Answered

Please input your answer below:

3 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:

4 Please provide any data and evidence on whether this policy is likely to reduce delays to energy infrastructure build and how long by.

Please input your answer below:

5 Are there any groups you expect would be uniquely impacted by these proposals, such as small and micro businesses or people from protected characteristics? If yes, which groups do you expect would be uniquely impacted?

Please provide supporting evidence: