

Electricity Transmission Network Acceleration Team
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Consultation on Community Benefits for Electricity Transmission Networks Infrastructure

Scottish Renewables is the voice of Scotland's renewable energy industry. The sectors we represent deliver investment, jobs, and social benefits and reduce the carbon emissions which cause climate change. Our 330-plus members work across all renewable energy technologies, in Scotland, the UK, Europe, and around the world. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can help sustainably heat and power Scotland's homes and businesses.

Scottish Renewables welcomes the opportunity to respond to this consultation on Community Benefits for Electricity Transmission Networks Infrastructure.

We welcome the proposed guidance and agree it is right to recognise the contribution made to netzero by the communities that host transmission infrastructure. It is important that they can see the positive impact of their contribution. Therefore, it is fitting for the UK government to gather feedback on the most effective means of providing such benefits.

The transmission network has a critical role to play in enabling both the UK and Scottish Government's net-zero targets. To meet existing decarbonisation ambitions, transmission infrastructure needs to be deployed at an unprecedented pace and scale to ensure that there is enough network capacity to enable the connection of new generation to meet the forecast growth in demand as we continue to electrify the economy. It is crucial to engage communities in the path towards achieving net-zero and minimise any potential delays in infrastructure delivery due to community objections.

We are supportive of the government's ambitions to introduce community benefit schemes for electricity transmission infrastructure. We think these funds should provide ambitious and transformational levels of funding and be focussed on delivering lasting legacies for communities that contribute to boosting local jobs and provide greater employability and education opportunities.



Third Floor, 24 St Vincent Place, Glasgow, G1 2EU ① 0141 353 4980 @ScotRenew We are also highly conscious that electricity bill payers' money will fund community benefits and therefore we must ensure that the proposals represent value for the GB consumer.

Further, this consultation must work within the boundaries of current planning legislation which these kinds of projects are already subject to such as compulsory purchase and Environmental Impact Assessment. We would seek clarification that this will be taken into consideration to ensure there are no duplications or onerous expectations on developers.

Whilst we welcome this initial consultation, it is high-level in nature and does not clearly indicate what final guidance will look like. Therefore, we believe there is a clear need for government to publish a draft guidance document with a further opportunity for consultation with stakeholders as soon as possible.

We believe that community benefit guidance should be clearly linked to the infrastructure impact in relation to the local community and ensure that those communities who host the infrastructure are benefiting. A coordinated but suitably flexible approach will be needed to reflect the diversity of community needs and circumstances across the country, particularly regarding wide variations in population density. It will also be important to ensure that communities receive fair and proportionate benefits that take account of existing transmission infrastructure e.g., the proportional impact of a third transmission line being added where two are already present is markedly different from the establishment of an entirely new transmission line. Clear guidance on what types of benefits will be eligible would support this.

An element of the consultation that Scottish Renewables does not support is the suggestion that direct community benefits (i.e., payments to individuals) should form part of a community benefits package.

Such payments would not benefit the community as a whole and risk compromising the key principle that planning permission cannot be bought or sold. Ensuring that such direct payments to individuals cannot form part of a community benefits package would strengthen the integrity of the measure and its perceived independence from the planning process. Furthermore, the proposal to focus on direct community benefits would also be an undesirable departure from the current practice and would set an unwelcome precedent that could have negative implications for future energy infrastructure developments and, indeed, any significant infrastructure developments more generally.

We would like to highlight that funds should be sufficiently flexible in scope to enable developers to deliver on the bespoke needs of each individual community.

Scottish Renewables is leading a conversation between the renewable energy industry and The Scottish Government in relation to the establishment of the Scottish Onshore Wind Sector Deal

(SOWSD), due to be finalised this year. The SOWSD will seek to capture the needs and ambitions of The Scottish Government and the Scottish wind industry in relation to delivering a minimum installed capacity target of 20GW of onshore wind in Scotland by 2030. Meeting the ambition of a minimum of 20GW of installed onshore wind by 2030 will represent a significant change to Scotland's power infrastructure. The SOWSD highlights the need for developers to act as 'good neighbours', working in tandem with local communities to establish positive relations, ensure a Just Transition, and progress projects efficiently.

The Scottish Government's Onshore Wind Policy Statement 2022¹ (OnWPS) commits to the principles of a Just Transition to a net-zero economy, meaning communities across Scotland feel the benefits of the energy transition. The policy statement sets out the benefits expected for local communities which the Sector Deal will support. It is trusted that the UK Government's consultation on Community Benefits for Electricity Transmission Network Infrastructure will take into consideration the OnWPS and ongoing SOWSD work.

Scottish Renewables would be keen to engage further with this agenda and would be happy to discuss our response in more detail.

Yours sincerely,

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¹ Onshore Wind Policy Statement 2022