

Karen Murphy submission of 10 August 2021

PE1885/A – Make offering Community Shared Ownership mandatory for all windfarm development planning proposals

A government policy which falls short of requiring developers to offer Community Shared Ownership (CSO) will mean that the Scottish Government fail to reach the much-publicized targets set out for Community and locally owned energy (energysavingtrust.org.uk). For the Government to achieve its 2GW Community Owned target in 2030, a further 1.15GW of Community Ownership is needed.

Given the loss of Feed in Tariff, this will only be realised if Commercial Onshore Windfarm developers offer and secure CSO in the new developments planned/approved/built by 2030. Through this, we could meet the SGs target of 50% of the Energy for Scotland's heat, transport, and electricity consumption to be supplied from renewable sources (17GW from renewables). The [Scottish Government](#) states “This assumes a considerably higher market penetration of renewable electricity than today – requiring in the region of 17 GW of installed capacity in 2030 (compared to 9.5 GW in June 2017)” If only 50% of these planned developments get CSO, that will mean 30% CSO is required for those that make the investment. Increasingly windfarm developers build windfarms to immediately sell them on to Capital Investment firms, and with no requirement to offer CSO, it is seemingly an added (and unnecessary) complication to their ability to sell, so offers of CSO are withheld. This is compounded by subsidies no longer being available to developers. In my view, a coherent political national response is required, with the simplest solution being to mandate that all windfarm developments must offer and secure 15% CSO investment.

Without CSO, communities will be unable to implement legacy projects identified in their Local Development Plans (LDP). Additionally, while it is positive that the Scottish Government empowers local communities through the Community Empowerment (Scotland) Act, unless communities have financial resources, they will be unable to meet their own targets as other sources of funding, such as National Lottery, are getting harder to access. Many of the projects identified by LDPs benefit

both residents and visitors, and I believe that being unable to deliver them will have a detrimental impact on rural communities and tourism.

The Scottish Government has committed to update the Onshore Wind Policy Statement to ensure that it reflects Scotland's binding climate change targets, aspirations for Onshore Wind in Scotland, and their need to fulfil Community Owned Targets. This commitment demonstrates that the disparities need to be addressed. Mandating CSO in Onshore Windfarms could be seen as a devolved power since it initiates a major economic development. Furthermore, the Scottish Government has the power to raise new land taxes on any transactions involving interests in land, (Part 4A Chapter 3 of the Scotland Act) - Land leases that wind farm developers take out with the landowners (often on a rental basis) fall under this type of transaction. Therefore the SG could raise a new 'tax', requiring all developers who don't own the land to offer 15% CSO to locally impacted communities. This would ensure the SG meets its 2030 Community Owned Target of 2GW of Renewable Energy and provide a fairer and potentially more attractive situation for local communities to deliver on their LDP targets.