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Submitted to Community Benefits and Shared Ownership for Low Carbon Energy Infrastructure
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About you

What is your name?

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What is your organisation?

Organisation:
The Strathclyde Institute for Sustainable Communities, University of Strathclyde

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

Other

If other, please specifiy :
University, Higher Education

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?:
Social media

Other (please specify):

Community benefits: Proposal

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

Neither agree nor disagree

Please explain why/why not:

In principle, we strongly support the need for developers to deliver low-carbon energy infrastructure in a way that creates and distributes benefits amongst a community. Here we define community benefit as: “a demonstrable uplift in the wellbeing of a community, either of place and/or practice”.

Whilst Community Benefit Funds (CBFs) can be an effective means of delivering community benefit, and have become a common means of doing so in the UK. However, they are not necessarily the only means of creating and distributing benefits amongst communities, and by extension, of redistributing wealth across society.

Other options for generating community benefit do exist, such as generating tax revenues levied on these infrastructures, and redistributing these through different levels of government. These options present a fundamentally different model for distributing wealth compared to CBFs. Examples of difference include the fact that CBFs are a market mechanism, as opposed to a governmental fiscal policy, and CBFs are currently voluntary funds, as opposed to mandatory forms of taxation.

We are not aware of any research that has analysed the different methods of creating and distributing community benefits, and their respective merits, suggesting this may be an important research gap that requires further work. Further research may therefore be needed to comprehensively assess how these different models for wealth redistribution impact local communities, the wider public (via the exchequer) and project owners, as well as who should have a say on how benefit is created and distributed within a particular community and place.

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 recommended that all types of low carbon infrastructure should be considered for CBFs but given the focus of the white paper on energy, we broadly agree with the proposed list presented on p.14 as a sensible starting place.

More generally, as outlined in Strathclyde's Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds (Hannon et al., 2025), a truly inclusive and flexible approach to CBFs should determine whether a CBF is an appropriate course of action on a case-by-case basis, rather than assuming that all projects of a certain technology should apply a CBF.

Community Benefit Funds (CBFs) are often presented as a way of ensuring that communities actively and tangibly benefit from the energy transition. Following this logic, there is no reason why only certain energy transition technologies should be required to provide CBFs while others are exempt. By considering some technologies, developments and initiatives to be 'in scope' for the provision of CBFs, and others not, this potentially creates asymmetries in the energy market, distorting the basis for competition, as well as the wider public narrative. We would therefore recommend that guidance on CBFs is designed for all revenue generating climate compatible energy technologies, and furthermore, should be applicable to other low-carbon technologies, developments and initiatives or projects (e.g. natural capital), given these are likely to become much more prevalent over the coming years.

Similarly, there is a compelling argument for CBF guidance to also apply to high-carbon infrastructure, or developments that do not contribute so clearly towards net zero sustainable society. It could be argued that expecting renewable energy developers to contribute to community funds while not imposing the same requirement on revenue generating proportionally high carbon developments is unfair on renewables developers, and also unfair on communities that are host to climate harming infrastructure. Given the significant environmental and societal impacts associated with high carbon projects, there is a strong case for requiring them to contribute substantially larger community benefit funds.

An important next step for government is to develop a clear selection criteria, to be used for determining when it is – and is not – appropriate to establish a CBF for a project; be it net zero, energy related or otherwise. This should clearly articulate the underpinning logic for applying a CBF in terms of the need to generate and share benefits with the local community and why a CBF is the most appropriate mechanism versus other options. This could be applied to any kind of infrastructure project – net-zero or otherwise - and would help developers and communities to navigate whether or not a CBF is the most appropriate way forward for them. This would likely complement the outcomes of the recommended work outlined in our response to Question 1, as there may be instances where a CBF is not the more appropriate wealth redistribution model for certain types of infrastructure, and that alternative models may present a better fit.

References

• Hannon, M., Gowens, R., Searle, R., Roberts, J. J., Cairns, I., Major, L. (2025) Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds, Strathclyde Institute for Sustainable Communities, University of Strathclyde. https://doi.org/10.17868/strath.00092494

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:

N/A

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, we agree that there needs to be provision for amending the scope of the policy in the future to ensure that it can be adapted to fit future technological changes. This flexibility is essential to keep the policy relevant, effective and responsive to evolving technologies and emerging challenges.

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

Agree

Please provide reasoning for your answer:

Yes, we agree with the proposed approach of treating each infrastructure asset within a co-located site individually for the purposes of determining whether a project falls within the scope of the scheme.

This method provides greater clarity and consistency for both developers and communities, reducing ambiguity and ensuring a fair and transparent process. It supports a structured framework while still allowing room for feedback on how flexibility might be introduced to support innovation and encourage co-location where appropriate.

Should a rigorous and systematic approach to determining the depth and breadth of wealth distribution from projects be employed, then it is expected that the co-location would typically be scored more preferentially by virtue of minimising negative impacts. For example, co-locating a battery storage site with an onshore wind farm would entail additional development on an already developed site, thus not carrying the same environmental, aesthetic and public utility impacts of developing on pristine sites of high-ecological value. Co-location could also present opportunities to utilise shared infrastructure (e.g. roads, transmission), reducing the need for additional construction and its associated disruption, as well as reducing project costs. These co-location benefits may also yield the benefit of higher levels of community acceptance too.

Community benefits: Thresholds

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

Neither agree nor disagree

Please provide reasoning for your answer:

In the context of power generation, taking installed generation capacity as one of the key criteria for assessing the scale of community benefit distribution seems appropriate. Whilst we acknowledge that capacity is typically a good indicator of the scale of impact a project is likely to have on local communities, it is not the only characteristic that should be under consideration when assessing whether a project ought to establish a CBF or not. Other critical considerations include the spatial distribution, timing, longevity and severity of a project’s impacts, as well as offering a balanced picture of a project’s net-impact, by comparing and contrasting a project’s positive impacts against its negative ones.

Should a “capacity cap” exclusion/inclusion criteria be adopted for power generation and storage assets, then a comparable exclusion/inclusion criteria would be needed for other types of net-zero projects whose size cannot be measured by generation capacity. For example, it is unclear how such an inclusion criteria for size or scale may be applied to transmission networks or CCUS that are not generation technologies, and would therefore require a different indicator of scale.

Finally, whilst we agree that the establishment and administration of a CBF carries certain fixed administrative costs that could disproportionately burden the smallest projects, we would warn against applying a 5MW threshold without further evidence of the following:

• That projects below 5MW are disproportionality impacted by the cost burden of establishing and administering a CBF versus projects above 5MW. We expect this to be scalable, meaning that projects over 5MW may still be at a disadvantage versus much larger projects, due to the economies of scale. For example, a project of 10MW is likely to face higher fixed costs for administering a CBF as a proportion of project revenue relative to a 100MW or 1GW project.

• That projects above 5MW but still relatively small in size (<10MW) are: a) readily able to access secure funding via the CfD*; and b) access to the CfD means they are in a stronger position to establish and administer a CBF.

* According to the UK Government’s Renewable Energy Planning database, since 2016 - when the first CfD Allocation Round began delivery projects - just four operational renewable energy projects between 5-10MW received CfDs. This is just 1% of the total 343 projects between 5-10MW installed since 2016. This suggests that the vast majority of small projects (e.g. 5-10MW) do not receive CfDs but under the current white paper guidance, would be mandated to set up a CBF, should a mandatory scheme be introduced. This raises questions about the integrity of such a “capacity cap”, with numerous small schemes having to establish CBFs but without the revenue security afforded by a CfD.

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

Don't know

Please provide reasoning for your answer:

We recommend that whatever inclusion criteria for CBF creation is adopted, it offers a level playing-field for technologies. This means that no specific CBF inclusion guidance is established for specific net-zero technologies but that all projects are assessed on a case-by-case basis using a single, standardised impact assessment framework. This framework would assess the net-impact of projects on local communities across a range of dimensions (social, economic, environmental etc.), and the spatial distribution, timing, longevity and severity of these impacts. Such an approach would be sensitive to the co-benefits these technologies can offer communities, as well as their perceived negative impacts. This approach would then provide an objective assessment of whether a CBF is necessary, and furthermore offering guidance on the level, longevity and spatial distribution of any CBF wealth redistribution.

This framework would also be considerate of the maturity of these technologies and their projected profit margin, to ensure that nascent technologies that cannot compete with mature generation technologies on cost alone, are not held to the same CBF regulations. In short, less profitable, immature technologies should not have to surrender the degree of revenue versus more profitable, mature technologies on a ‘£ per MW installed per annum’ basis.

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

Please provide reasoning for your answer:

Community benefit packages do not necessarily have to purely comprise of financial payments. Instead, in-kind benefits can be – and are – provided. One of the most important forms of in-kind benefit for communities is that of providing the community with a share of the energy project.

A share of the project’s ownership can provide communities with a long-term revenue stream, and prior studies suggest that this can offer significantly more value to the community than the Scottish Government’s Scottish Government Good
Practice Principles for Community Benefits from Onshore Renewable Energy

Developments recommended rate of £5k per MW installed per annum do. For example, a recent report by Equitable Energy Research CIC (link below) compared commercial versus community ownership, and finding that community projects regularly generate 10 to 100 times the annual revenue to communities versus Community Benefit Fund payments. However, the total returned to the community will vary on a case-by-case basis and assuming the returns are linked to the revenue generated, will likely vary on a year-to-year basis too.

In terms of how shared ownership arrangements interact with any mandated community benefit fund contributions, we recommend the following:

• To formulate and employ a robust methodology is employed to accurately predict the average annual revenue generated from the community-owned portion of the project, for the duration of the project's operational life.
• To balance the projected revenue against any annual, index-linked benchmark value for community benefit provision, as set out by UK Government. If the projected annual revenue falls below this threshold, then this should be "topped up" via other financial or in-kind CBF contributions.
• To better understand how much risk a community is exposed to as part of this shared ownership arrangements and any additional administrative burden it will entail by way of management. For example, if a community's share of ownership entitle it to a share of the project's revenue generated that year, then community's income via the CBF will likely vary year-on-year and be contingent on various factors such as costs, the price of electricity, load factor etc. This presents a different risk profile to the community versus a guaranteed '£ per MW installed per annum' model.

References

• Equitable Energy Research CIC (2025) Social value from renewables in the Highlands and Islands
https://platformlondon.org/app/uploads/2025/05/Social-Value-from-Renewables-EER-280525.pdf

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

Not Answered

Please provide reasoning for your answer:

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:

According to Local Energy Scotland's Community Benefit Register, the following financial models are used to determine the level of financial payments to communities via CBFs:

• £ per MW installed per annum
• £ per MWh generated per annum
• Fixed £ per annum
• % of profit per annum

Of the 175 projects in the Community Benefits Funds database (Local Energy Scotland 2025), the vast majority of these operated a '£ per MW installed per annum' (83%), with 6% operating a '£ per MWh generated' model and 5% a 'fixed £ per annum' model. Just one project (0.6%) operated a '% of profit per annum' model, while 6% operated entirely different benefit sharing models (no further information provided).

The only other point to note is that as of July 2024, most payments were index-linked (62%), however for 39% of projects the details were unknown and 1% of projects were not index-linked. Consequently, most community benefit payments will rise year-on-year, in-line with inflation but not necessarily for all CBFs.

References

• Local Energy Scotland (2025) Community Benefit Funds, https://localenergy.scot/projects-overview/funds-index/

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:

We are not quite clear what question 11 refers to. We assume this relates to p.18 and community ownership of energy projects, and the extent to which this may or may not require a CBF arrangement. We answer the question as such below.

We would caution against a blanket CBF exemption for wholly- or partly-owned net-zero projects. As outlined by Braunholtz-Speight et al. (2018) community energy projects assume a variety of different forms of legal incorporation (e.g. cooperative, CIC, company limited by guarantee etc.). Furthermore, as outlined by Cairns et al. (2023) these can then draw upon a wide variety of different forms of finance (loans, shares, bonds etc.) to capitalise their operations. The two dimensions are also connected, where certain types of legal incorporation will allow - or prohibit - different types of finance.

The implication is that not all community energy projects are the same and depending on their legal incorporation and finance arrangements, they will pose a different risk-reward profile for communities revolving largely around the two pillars of: a) the degree of control and responsibility they assume for the project's operations and b) the degree of financial risk and reward they might expect to assume.

Underlying these arrangements is the fact that a community-owned energy project do not de facto directly benefit and/or empower all members of a local community. For instance, a community energy project may only provide voting rights and dividends to members of the community who have invested in the project. Similarly, it's quite possible for members to invest in community projects who do not live locally, such as Green Energy Mull (Cairns et al. 2023), further complicating the picture.

It is therefore critical that any assessment of whether a community-owned project should establish a CBF first considers what type of ownership and financing arrangement is in place, and what (dis)benefits this may pose to the community.

Consequently, aligned with our response to Question 8, we recommend that like for technology, that the government assumes an ownership and financing agnostic approach to their CBF inclusion criteria. Instead, the merit of the ownership and financing arrangements for a given project should become clear on a case-by-case basis when assessed against a robust set of impact assessment criteria, which should uncover the extent to which these projects are able to empower and enrich a local community. On the basis of this assessment, it may become clear that additional redistribution of wealth may be necessary and thus, establishing a CBF is deemed appropriate.

References

• Braunholtz-Speight, T., Mander, S., Hannon, M., Hardy, J., McLachlan, C., Manderson, E. & Sharmina, M. (2018) The Evolution of Community Energy in the UK, London: UKERC. https://d2e1qxpsswcpgz.cloudfront.net/uploads/2020/03/ukerc-wp_evolution-of-community-energy-in-the-uk.pdf
• Cairns, I., Hannon, M., Braunholtz-Speight, T., McLachlan, C., Mander, S., Hardy, J., Sharmina, M., & Manderson, E. (2023) Financing grassroots innovation diffusion pathways: the case of UK community energy, Environmental Innovation and Societal Transitions, 46 https://doi.org/10.1016/j.eist.2022.11.004

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

Please provide reasoning for your answer:

Please see our response to Question 7. We have copied and pasted the relevant excerpt below:

"This framework would also be considerate of the maturity of these technologies and their projected profit margin, to ensure that nascent technologies that cannot compete with mature generation technologies on cost alone, are not held to the same CBF regulations. In short, less profitable, immature technologies should not have to surrender the degree of revenue versus more profitable, mature technologies on a '£ per MW installed per annum' basis."

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:

In our response to this question, we focus exclusively on the use of regional funds.

As outlined in Strathclyde's Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds (Hannon et al., 2025), we recommend that CBFs Strategically coordinate CBF investment with other community-, local- and regional-level funding streams (Action C2). This is especially true for larger funds that have a greater sum of funding to distribute, normally across a wider geographical area.

Operating in isolation, a CBF fund may not be sufficiently large to unlock more significant, strategic projects capable of creating lasting community benefit. However, if CBFs are coordinated with other funding streams (including other CBFs), they may be able to unlock more strategic investments to achieve their defined objectives. At the same time, such an approach can help avoid duplication of funding/effort.

Co-ordinating different funding steams requires that investment decisions are strategically coordinated across different levels (e.g. community, local, regional), different actors (e.g. Community Councils, Development Trusts, Local Authorities) and different funds (e.g. multiple CBFs). In this way they can avoid being siloed. Solutions to support this action include:

• Developers, owners and other CBF stakeholders refer to community priorities as laid out in community and local planning strategies including Local Place Plans, Locality Plans, Community Action Plans and Local Outcomes Improvement Plans and ensure these are aligned with higher-level National Planning Framework National Outcomes.
• Raise awareness of what are – and what are not – the statutory responsibilities of Local Authorities.
• Coordinate more effectively between statutory (e.g. Local Authorities, CCs) and non-statutory bodies (e.g. Development Trusts, intermediaries), as well as other funding streams, to identify strategic investment priorities, improve coordination of investment and remove potential duplication of effort.
• Design CBFs so that they are flexible enough to enable communities to grasp unforeseen opportunities and manage unforeseen challenges, such as releasing additional funds ahead of schedule or swiftly refocusing thematic funds.

It is also important that CBFs Adopt a long-term and flexible approach to defining
CBF priorities and community benefit support (Action A3) (Hannon et al. 2025). In this context, it is possible to 'build-in' flexibility into the CBF's structure to ensure that alignment between other CBFs or across geographic boundaries is made possible, where the opportunity arises and there's value in doing so for all communities involved. This includes:

• Making provision for both:
o Open, responsive-mode funding calls, which allow for community-led proposals.
o Strategic, targeted funding calls, which allow for CBF decision maker led proposals.
• Permitting CBF investment to extend beyond the local area where the need and opportunity exist but to ensure the decision-making remains localised

with any neighbouring communities.
• Allowing for a reprofiling of the CBF investment schedule, so that funding can be drawn down ahead of scheduled donations, where this can unlock strategic investments.

Finally, to provide connectivity across different local and regional plans, we recommend that CBFs should Integrate up-to-date local and community strategic plans into CBF design (Action A1) (Hannon et al. 2025). Strategic planning is needed for communities to create a shared vision of the future and consider what types of investment are required to realise that vision. Local and community strategic plans are therefore critical to informing the most appropriate priorities and channels for allocating CBF investment. It is essential that CBFs are aligned with such planning, to ensure that they are playing a key supporting role in delivering the community's priorities.

Such strategic planning is already an established practice for some UK communities. For example, there exist many community and local planning initiatives, including Local Place Plans (LPPs), Locality Plans, Community Action Plans (CAPs) and Local Outcomes Improvement Plans. These plans can vary widely, with some voluntary, some mandatory, some resourced (e.g. by the Local Authority) and others not.

In this context, it is important to note that some communities may not have yet gone through this planning process. Even where strategic plans do exist, they may still be out-of-date and require updating. Furthermore, it is also not always to what extent community strategic planning is built upon good practice principles for community participation and co-creation.

To provide CBF decision makers with a comprehensive and representative understanding of their community's needs, it is essential that sufficient resources are made available to support local and community strategic planning that aligns with good practice community participation and co-creation. Potential solutions to support this action include:

• Policy and regulatory frameworks that require community and local planning to be built on robust, good practice guidelines for community participation.
• Support (e.g. capacity building, mediation) to ensure the establishment and functionality of actors to lead community planning (e.g. Community Council, Development Trust).
• The development and utilisation of open-access training materials to support communities to lead participatory planning.
• Developers could offer advance CBF investments, prior to the project being fully operational, to support capacity building and training for participatory approaches and the development that supports planning. Examples include employing staff responsible to undertake community planning and peer-to-peer learning exchanges between communities to adopt good practice.
• Draw in the expertise of third parties who are experienced in facilitating community-led decision making.
• Ensure that local and community plans are compatible, aligned and regularly updated.
• Outline how community priorities (e.g. CAPs) will be progressed via CBF investment, with a focus on supporting both new and pre-existing community projects.

References

• Hannon, M., Gowens, R., Searle, R., Roberts, J. J., Cairns, I., Major, L. (2025) Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds, Strathclyde Institute for Sustainable Communities, University of Strathclyde. https://doi.org/10.17868/strath.00092494

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:

We do not provide a definitive and mathematical equation to calculate community benefit contributions payable by a project developer/owner, but instead we spotlight a few key principles that should be followed when assessing the level of contribution:

• Scale of the project: As discussed in Question 6, installed capacity and/or generation outputs are important proxies for the scale of the project in focus, and by extension the impact this may have on local communities. Smaller projects are expected to impact upon communities proportionally less versus larger ones; positively or negatively. Consequently, any remedial actions taken to address a net-negative impact on a community will typically be proportional to the size of the project. However, this is not the only consideration, as we outline below.
• Net-impact of the project: Low-carbon infrastructure projects can have positive, as well as negative impacts upon the local community. Consequently, it is important to understand that – for a given area – what the expected net-impact is likely to be across the area. The severity of these impacts should also be accounted for. For example, if a minor net-negative impact is evidenced for Project A versus a major net-negative impact for Project B, then one would expect Project B to contribute a relatively larger contribution to the local community. This is however complicated by the subjective nature of perceived impact and that a community may be divided over how they perceive the project to impact their community. For example, whilst the construction and decommissioning phases of a wind farm may prove disruptive to a local community due to issues such as noise, traffic etc., once built, some members of community may benefit from improved access to the local area as provided by roads, paths etc. Furthermore, as explained below, the longevity and timing of these impacts may mean that a project may shift between a net-positive and net-negative impact in the eyes of the community as a whole.
• Longevity and timing of the project's impacts: Each project moves through a lifecycle from pre-planning, design, construction, operation and maintenance, and decommissioning. Each stage will involve its own specific activities, bringing with them different impacts on the community, each commencing at different times. Furthermore, these impacts will have their own time horizon, being felt over the short, medium or long-term term, meaning some generate a larger cumulative impact over the life-time of the project versus those with shorter time-horizons. In this vein, some projects will bring long term co-benefits to a community of place or practice.
• Profit margin of the project: If the project is able to generate a significant revenue surplus, then in relative terms, project owners will be in a stronger position to relinquish a share of the profits to generate community benefit versus owners of projects with a much narrower profit margin.
• Year-on-year variability of surplus revenue: The variability of project surplus revenue will depend on a multitude of factors, such as the type of project

(e.g. generation, transmission, storage etc.), the technology employed, the finance repayments due, the price of energy etc. If the project is expected to return a highly variable annual profit, then it may be more appropriate to align community benefit payments with the scale of the project (e.g. capacity) to ensure they do not experience a "boom and bust" cycle of benefit contributions. This does however expose the project owners to greater risk in years of low or zero profitability, as they would still likely need to service these benefit contributions regardless.

Whatever the method for calculating the contribution made to the community, it is essential that these are sensitive to inflation. As noted in Strathclyde's Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds (Hannon et al., 2025), The Scottish Government's Scottish Government Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments (GPPs) (Scottish Government 2019) recommend that asset owners of onshore renewable energy projects should voluntarily provide community benefit packages with a value equivalent to £5,000 per MW installed per annum.

Since the guidance was published, the baseline- or starting-value of community benefit packages has increased on a 'per MW' basis, with the five-year average rising from £1,687 in 2004 to £4,725 in 2024. There are however indications this increase has now flat-lined, roughly in line with Scottish Government's recommended value of £5,000 per MW per annum (Hannon et al., 2025).

Current GPP guidance recommends these payments are index-linked, meaning
that year-on-year, the donations made into these CBFs rise with inflation against the baseline value committed to in the first year. As of July 2024, most payments were index-linked (62%), however for 39% of projects the details were unknown and 1% of projects were not index-linked (Local Energy Scotland 2025).

Importantly however, Scottish Government's guidance does not recommend that the baseline figure of £5,000 per MW is index-linked. Consequently, most new projects are still setting an initial baseline- or starting-package value of £5,000, even though the equivalent starting value would have stood at £6,695 in 2024 if it had risen in line with inflation from 2014 against the Consumer Price Index. This would equate to an additional £1,695 worth of community benefit packages per MW per annum for a given CBF versus the current recommended rate.

Record energy prices since the 2021 energy crisis have significantly boosted energy supplier profits (End Fuel Poverty Coalition, 2024), yet the value of community benefit packages has not increased in line with these rising profits. Compared to a decade ago, a larger share of surplus revenue is now being retained by energy asset owners rather than being shared with communities. Therefore, it is essential that UK Government sets a fair value for community benefit packages and index-links this value to the year the benchmark was introduced, to ensure the value keeps pace with inflation and in real-terms remains as valuable to communities over the course of the project.

References

• End Fuel Poverty Coalition (2025) Energy firm profits tracker. https://www.endfuelpoverty.org.uk/news/energy-frm-profts-tracker/
• Hannon, M., Gowens, R., Searle, R., Roberts, J. J., Cairns, I., Major, L. (2025) Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds, Strathclyde Institute for Sustainable Communities, University of Strathclyde. https://doi.org/10.17868/strath.00092494
• Local Energy Scotland (2025) Community Benefits Register https://localenergy.scot/projects-overview/map/?project_type=cb_offered
• Scottish Government (2019) Good Practice Principles for Community Benefits from Onshore Renewable Energy Developments https://www.gov.scot/publications/scottish-government-good-practice-principles-community-benefits-onshore-renewable-energy-developments/documents/

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

Agree

Please provide reasoning for your answer:

Yes, please refer to answer to question 13, which is copied below for simplicity.

"As outlined in Strathclyde's Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds (Hannon et al., 2025), we recommend that CBFs Strategically coordinate CBF investment with other community-, local- and regional-level funding streams (Action C2). This is especially true for larger funds that have a greater sum of funding to distribute, normally across a wider geographical area.

Operating in isolation, a CBF fund may not be sufficiently large to unlock more significant, strategic projects capable of creating lasting community benefit. However, if CBFs are coordinated with other funding streams (including other CBFs), they may be able to unlock more strategic investments to achieve their defined objectives. At the same time, such an approach can help avoid duplication of funding/effort.

Co-ordinating different funding steams requires that investment decisions are strategically coordinated across different levels (e.g. community, local, regional), different actors (e.g. Community Councils, Development Trusts, Local Authorities) and different funds (e.g. multiple CBFs). In this way they can avoid being siloed. Solutions to support this action include:

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• Making provision for both:
o Open, responsive-mode funding calls, which allow for community-led proposals.
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• Permitting CBF investment to extend beyond the local area where the need and opportunity exist but to ensure the decision-making remains localised with any neighbouring communities.
• Allowing for a reprofiling of the CBF investment schedule, so that funding can be drawn down ahead of scheduled donations, where this can unlock strategic investments.

Finally, to provide connectivity across different local and regional plans, we recommend that CBFs should Integrate up-to-date local and community strategic plans into CBF design (Action A1) (Hannon et al. 2025). Strategic planning is needed for communities to create a shared vision of the future and consider what types of investment are required to realise that vision. Local and community strategic plans are therefore critical to informing the most appropriate priorities and channels for allocating CBF investment. It is essential that CBFs are aligned with such planning, to ensure that they are playing a key supporting role in delivering the community's priorities.

Such strategic planning is already an established practice for some UK communities. For example, there exist many community and local planning initiatives, including Local Place Plans (LPPs), Locality Plans, Community Action Plans (CAPs) and Local Outcomes Improvement Plans. These plans can vary widely, with some voluntary, some mandatory, some resourced (e.g. by the Local Authority) and others not.

In this context, it is important to note that some communities may not have yet gone through this planning process. Even where strategic plans do exist, they may still be out-of-date and require updating. Furthermore, it is also not always to what extent
community strategic planning is built upon good practice principles for community participation and co-creation.

To provide CBF decision makers with a comprehensive and representative understanding of their community's needs, it is essential that sufficient resources are made available to support local and community strategic planning that aligns with good practice community participation and co-creation. Potential solutions to support this action include:

• Policy and regulatory frameworks that require community and local planning to be built on robust, good practice guidelines for community participation.
• Support (e.g. capacity building, mediation) to ensure the establishment and functionality of actors to lead community planning (e.g. Community Council, Development Trust).
• The development and utilisation of open-access training materials to support communities to lead participatory planning.
• Developers could offer advance CBF investments, prior to the project being fully operational, to support capacity building and training for participatory approaches and the development that supports planning. Examples include employing staff responsible to undertake community planning and peer-to-peer learning exchanges between communities to adopt good practice.
• Draw in the expertise of third parties who are experienced in facilitating community-led decision making.
• Ensure that local and community plans are compatible, aligned and regularly updated.
• Outline how community priorities (e.g. CAPs) will be progressed via CBF investment, with a focus on supporting both new and pre-existing community projects.

References

Hannon, M., Gowens, R., Searle, R., Roberts, J. J., Cairns, I., Major, L. (2025) Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds, Strathclyde Institute for Sustainable Communities, University of Strathclyde. https://doi.org/10.17868/strath.00092494"

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?

Neither agree nor disagree

Please provide reasoning for your answer:

a) When payments apply

Aligned with the Strathclyde GPAs' Adopt a long-term and flexible approach to defining CBF priorities and community benefit support (Action A3) (Hannon et al. 2025), we broadly agree with the proposed arrangement regarding when payments are made to communities.

In particular, we support the proposal to allow for – and indeed encourage – developers to make "lump sum" payments available in advance, should the community make a reasonable argument for drawing these payments down ahead of the original schedule, particularly where this can unlock time-sensitive strategic investment opportunities.

There may even be an argument for issuing payments *before* the project is operational and generating revenue, to ensure that the community is adequately prepared to take receipt of the funds and manage them effectively. For example, advance CBF payments could usefully support capacity building and training for participatory approaches and the development that supports planning. Examples include employing staff responsible to undertake community planning and peer-to-peer learning exchanges between communities to adopt good practice.

b) Index linking

See our answer to Q14 for our full response. In summary, it is essential that UK Government sets a fair value for community benefit packages and index-links this value to the year the benchmark was introduced, to ensure the value keeps pace with inflation and in real-terms remains as valuable to communities over the course of the project.

c) Changes in lifespan / capacity / ownership

In line with the spirit of the Strathclyde GPAs Action A3 (Hannon et al. 2025) we generally agree with the proposal as laid out in the government's white paper. In simple terms, if there is a fundamental change to the operational characteristics of the energy project (e.g. lifespan, capacity, ownership, financing) then this ought to be factored in to any proportional changes to the underlying Community Benefit Agreement, which will then outline any appropriate adjustments to the Community Benefit Fund (e.g. scale, timing, longevity, geographical distribution etc. of benefit contributions). Please see our response to Question 11 for a more details in relation to this.

d) Suspension of payments

It is reasonable to expect developers to hold insurance to cover their liabilities in the event that the energy asset becomes non-functional. In such cases, suspending community benefit payments may not be necessary. Therefore, any suspension of payments should be considered only as a last resort and it should be possible to avert this situation with appropriate risk management and planning.

References

• Hannon, M., Gowens, R., Searle, R., Roberts, J. J., Cairns, I., Major, L. (2025) Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds, Strathclyde Institute for Sustainable Communities, University of Strathclyde. https://doi.org/10.17868/strath.00092494

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?

Agree

Please provide reasoning for your answer:

This appears to be a sensible approach.

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:

Yes, democratically constituted CBF organisations should have complete discretion over how the CBF money is spent, as long as this spend is compliant with the underpinning Community Benefit Agreement that outlines eligible areas for investment, as agreed between the community and the project owner, and this Agreement is subject to regular review.

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?

Neither agree nor disagree

Please provide reasoning for your answer:

We deal with each aspect of the proposes governance structure in turn, and in doing so, address the appropriateness of the governance structure as a functioning whole.

Fund administrator

We support the need for a fund administrator where the community and/or project owner lack the institutional capacity and/or capabilities to manage the complexity of a CBF (see Strathclyde GPAs, Actions A4 and B3 in Hannon et al. 2025). In such cases, it may be appropriate to outsource this administration to a third-party fund administrator (e.g. Foundation Scotland) who have the requisite experience, expertise and capacity to manage the fund effectively. However, it does not follow that an external Fund Administrator must be employed because there are already cases where CBFs are not being managed by third-parties but instead where administrative responsibilities are shared between the project owner and the community's Independent Organisation (IO) to be fulfilled "in-house", such as employed by SSE.

Even so, we recognise the important work that third-party administrators offer communities and project owners alike. Furthermore, it is often the case that to manage a CBF "in-house" effectively, the community and/or the project owner will still need to invest in training and support across a variety of areas that support community benefit decision making and administration (e.g. community engagement, financial management, directorship, monitoring and evaluation etc.). Finally, even where a Fund Administrator is responsible for administering a CBF, they will typically devolve much – if not all – of the decision making powers regarding allocation of funding the community via a Fund Panel.

In general, where a Fund Administrator is involved, we recommend that this be a decision jointly made by the community and the project developer. This somewhat contrasts with the text outlined on p.34 of the white paper, which suggests that this decision would entirely be at the discretion of the project developer/owner. Furthermore, the fund administrator's role should also focus on building capacity within the community, particularly where such capacity is currently limited or cannot be readily developed, to better equip the community and developer "in-house" where there is an appetite to do so.

We also recommend that, whether it be a third-party fund administrator or the community who is responsible for managing the CBF, the fund administrator should be a formally incorporated organisation. This body should have legal standing and be tasked with appointing the fund administrator and providing oversight to ensure that the fund operates in alignment with community interests and principles of good governance. This aligns with Strathclyde's GPA Action A4 that the key body in the CBF is the legally incorporated organisation which is responsible for governing and/or administering CBFs (Hannon et al. 2025).

It is important to note that through our ongoing case study of Foundation Scotland (due to be published shortly), there are instances where the community may wish to out-source all responsibility for funding allocation to the third-party Fund Administrator. Reasons can be numerous but note one instance where a community wanted to outsource this responsibility to avoid conflicts within the community as a result of the politics of funding allocation.

Administrative body

Drawing upon Strathclyde's GPA Action B1 (Hannon et al. 2025), the role of data monitoring and the maintenance of a community benefits register is already managed by Local Energy Scotland (LES) for Scottish based energy-project CBFs. The data covers, among other information: a) where they are located, b) the projects, technologies and developers they're associated with; and c) the value and type of community benefit packages (e.g. payments, shared ownership).

Whilst LES's registry could be significantly improved in a number of ways (see below), the rest of the UK does not have such a registry, and therefore, a "bird's eye view" of CBF trends across these nations is not forthcoming. Such a body should be established across the UK, to provide full geographical coverage of CBF data. It is also essential that the data collection and curation methods are standardised and comparable across all four UK nations, so that the data can be consolidated within a single searchable platform.

Building upon LES's Scottish CBF Registry, a UK wide registry could be improved in the following ways, particularly with a focus on expanding the number of projects covered by the register and the variety of information that the registry captures. Solutions to support this include:

• Expand the registry of CBF investments to incorporate a wider pool of project and technology or development types (e.g. natural capital), as well as more detailed information including the type of CBF governance model and community impacts.
• A mandatory requirement on all CBFs to report standardised data annually, to be uploaded onto a central repository.
• The provision of guidance for project owners and communities on collecting and collating CBF data and sharing this in a standardised and user-friendly format.

Community representatives
As outlined in the Strathclyde GPA's report, Action A4 dictates that a legally incorporated organisation should be responsible for governing and/or administering CBFs (Hannon et al. 2025). We therefore agree with guidance on p.33 of the white paper that suggest that a "Community Benefits Fund Panel or a new or existing community body could act as the community representatives", with two caveats. The first is the community body is established as an incorporated organisation (IO) and thus legally recognised. The second is that the Fund Panel should be established and supported via a Fund Administrator who is also established as an Incorporated Organisation (IO).

The next question relates to community representation on either a CBF Panel or the community IO. Strathclyde's GPAs present Action B3, which recommends that the make-up of the CBF decision-making body has representation from across the community (Hannon et al. 2025). The composition of the decision-making body, or organisation, should be as representative of the diverse interests of the community as possible and avoid being populated by any single interest group.

CBF decision-makers should be appointed via transparent and democratic processes, and membership should be open to all members of the community. That said, it can be challenging to form a CBF decision-making body that is truly representative of the whole community. These objectives can be supported by the following:

• Ensure the decision-making group members are elected according to democratic principles wherever practicable.
• Undertake community mapping (see Action A2), to understand the community's make-up in order to inform what interests may need to be represented.
• Provide open-access expert guidance on how to form a representative decision-making Panel, such as a participatory democracy toolkit.
• Put arrangements in place for marginalised and vulnerable community members who may require additional support in order to participate. This might include financial, language, audio-visual, physical accessibility, asynchronous participation support etc.
• Funding a Youth Panel, with a representative spokesperson from that Panel sitting on the main CBF decision-making group, can provide an opportunity for the community's younger generations to be heard. This could be facilitated by:

o working closely with local education institutional partners, youth groups/charities etc.; and
o the use of social media and online activities to engage younger community members about CBF opportunities, for example decision-maker vacancies and CBF funding.

Finally, we agree with the suggestion on pages 37 and 38 of the white paper that the community decision making body (e.g. Panel, IO, Fund Administrator) should seek guidance via community engagement where appropriate. This does not mean canvassing for community feedback on every single funding allocation decision, which is not practical. However, community engagement can be an important means of identifying priorities for community investment and how these might align with the community's vision for the future. As outlined in Question 13, local and community planning is the most appropriate forum for this objective setting, which the funding decision makers should then be accountable to, as per Action A1 of Strathclyde's GPAs (Hannon et al. 2025).

References

• Hannon, M., Gowens, R., Searle, R., Roberts, J. J., Cairns, I., Major, L. (2025) Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds, Strathclyde Institute for Sustainable Communities, University of Strathclyde. https://doi.org/10.17868/strath.00092494

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?

Neither agree nor disagree

Please provide reasoning for your answer:

See answer to question 20. In summary, it may be appropriate to employ an external Fund Administrator given the wealth of experience, capacity and capability they can bring to bear but this should be on a case-by-case basis and on the basis of a decision jointly made by the project owner and the community.

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 process for decision making, as long as it situates the community as the primary decision maker with support from the Fund Administrator. A more detailed response is presented in response to Question 20.

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

Disagree

Please provide reasoning for your answer:

We disagree with this proposal on the basis that it favours communities who have already made preparations to receive, manage and administer these funds. Such preparations may include engagement with Fund Administrator, establishing their own community Incorporated Organisation and/or undertaking their own community planning. Whilst it is important that these governance structures are in place to receive CBF monies that are to be distributed amongst the community to fund projects that add value to the community, we argue that there is a critical need to make CBF monies available to the community to lay the groundwork to ensure that robust and efficient governance structures are established in the first place. One cannot simply assume that all communities will require the same amount of time and support to establish these structures, and some communities may require more help that others to put these systems in place. Consequently, we reiterate part of our response to Question 16 below:

"Aligned with the Strathclyde GPAs' Adopt a long-term and flexible approach to defining CBF priorities and community benefit support (Action A3) (Hannon et al. 2025), we broadly agree with the proposed arrangement regarding when payments are made to communities.

In particular, we support the proposal to allow for – and indeed encourage – developers to make "lump sum" payments available in advance, should the community make a reasonable argument for drawing these payments down ahead of the original schedule, particularly where this can unlock time-sensitive strategic investment opportunities.

There may even be an argument for issuing payments *before* the project is operational and generating revenue, to ensure that the community is adequately prepared to take receipt of the funds and manage them effectively. For example, advance CBF payments could usefully support capacity building and training for participatory approaches and the development that supports planning. Examples include employing staff responsible to undertake community planning and peer-to-peer learning exchanges between communities to adopt good practice."

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: Enforcement

25 Do you agree with the suggested approach to enforcement of this potential scheme? To what extent do you think the enforcement mechanism outlined above is appropriate and proportionate for this potential scheme? What other details could be considered?

Not Answered

Please provide reasoning for your answer:

26 Do you agree with the proposed chain for dispute resolution between communities and administrators? Is the proposed escalating chain for resolving disputes appropriate and proportionate? Do you think we should include any more specific instances or reasons for enforcement action to ensure the robustness of the scheme?

Not Answered

Please provide reasoning for your answer:

27 Should consideration be given to imposing any of the proposed enforcement actions on other persons or groups under the scheme?

Not Answered

Please provide reasoning for your answer:

28 What do respondents think would be a practical use for any additional revenue generated from civil penalties?

Please provide reasoning for your answer:

There are significant challenges associated with developing community capacity in the context of Community Benefit Funds (CBFs). Drawing on Strathclyde's Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds (Hannon et al., 2025), we recommend that CBFs prioritise the provision of training and support for those involved in fund decision-making, in line with Action B3.

Strathclyde's Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds (Hannon et al., 2025) identifies several barriers to effective capacity building, including:

• A lack of understanding from decision makers about their training needs and available opportunities for addressing these.
• The lack of time, capacity and willingness of CBF decision makers to undertake training.
• A lack of funding to participate in training.
• The turnover of staff working for any of the IOs, or third-party support organisations, means that upskilling is an ongoing requirement for new staff

Given these challenges, we argue that any surplus funds should be strategically allocated to support training and capacity-building efforts for community members. Such investment is essential for fostering meaningful participation, improving governance, and ensuring the long-term sustainability of community-led decision-making structures.

References

• Hannon, M., Gowens, R., Searle, R., Roberts, J. J., Cairns, I., Major, L. (2025) Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds, Strathclyde Institute for Sustainable Communities, University of Strathclyde. https://doi.org/10.17868/strath.00092494

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:

Yes, a case-by-case approach to defining a specific community is appropriate.

The first consideration here should be what constitutes a community? Building on prior work (Hannon et al., 2025, 2024), we are extending the following definition:

"A community is a collective of people who are connected through a shared sense of identity, which is distinctive either in terms of place, such as a defined geographical boundary and/or practice, such as shared interests, motivations and values."

Inherent to this definition is a tension between whether a CBF should focus on a community of place and/or practice – if these communities can indeed be delineated. It does not always follow that communities located closest to a project, will be those who are most impacted; positively or negatively. Consequently, community mapping should be sensitive to spatially distributed and more distant community impacts, when undertaking the community mapping exercise. This may involve an initial consultation exercise with a diversity of stakeholders in order to identify 'in scope' communities, before engaging with these communities directly to verify or refute this provisional selection, prior to any revision of the inclusion criteria.

Drawing on Strathclyde's Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds (Hannon et al., 2025), this activity should align with the Principle that a Community Benefit Fund (CBF) should be Grounded in a long-term, flexible funding strategy that reflects a community's context and priorities. To enact this Principle, it is critical to Develop a detailed understanding of a community's characteristics and history

(Action A2).

This Principal and Action takes the view that no two communities are identical. They typically exhibit differences in the resources, capacities and capabilities they have at their disposal – and this changes through time. We note here the phrase that a community “is a living process of care for people and place” (Ford 2024). There is therefore no ‘one size fits all’ approach to generating community benefit, meaning that any plans to do so should be grounded in a community's characteristics and history.

To effectively distribute funding amongst a community to where it will be most valuable, it is important that CBF decision makers become familiar with the community’s context, including its challenges, priorities, values, cultural heritage and history. Without this background knowledge it is likely they will lack a comprehensive picture of how a project – and its CBF - may positively or negatively impact the community.

Some valuable background knowledge can be attained through reviewing existing community-led plans such as CAPs, however tacit knowledge may only be accessed through direct engagement with community stakeholders. Solutions to support this Action include:

• Raising the likelihood of community engagement by avoiding duplication of community effort and associated community engagement fatigue, by coordinating with community representatives and careful resourcing and coordination of engagement and planning.
• Establishing good practice guidance on how and when external parties should engage with communities to learn about their values, characteristics and history. This guidance would usefully spotlight key opportunities for engagement across all four stages of the CBF process (i.e. Initiate, Design, Operate and Evaluate).

Another essential means of enacting this Principle is to Adopt a long-term and flexible approach to defining CBF priorities and community benefit support (Action A3) (Hannon et al. 2025). CBFs typically exist as long as the project they are associated with is operating, such as the operational lifetime of an onshore windfarm. Consequently, the underlying Community Benefit Agreement (CBA) can span multiple decades. This invites a long-term perspective on benefit creation that is responsive to change; whether these are changes in the community and so might be demographic or economic, or broader external trends such as financial crises, health trends and changes in the cost of living.

While more recent CBAs already adopt this perspective – in line with the Scottish Government’s Good Practice Principles – this may not be the case for some older CBAs and there may be no option to update or renegotiate these. As such, the CBA may not reflect the community’s current characteristics or priorities, nor the wider market context. It is therefore important that provisions are made to update CBFs – and their underpinning CBAs – at regular junctures, so that they continue to reflect the evolving nature of the community and the broader context in which it is situated.

It is therefore important that CBF priorities and governance are periodically reviewed so that the CBF structure evolves with the community’s changing characteristics and needs. This can include geographical boundaries for engagement and distribution, as well as external context.

References

• Ford, B., (2024) Community is not a noun https://writingintoplace.publicarcomopractica.com/community-is-not-a-noun
• Hannon, M., Gowens, R., Roberts, J. J., Major, L. & Cairns, I., (2024) Community Participation for Community Benefits From Natural Capital Projects: A Review for the Facility for Investment Ready Nature in Scotland Programme, University of Strathclyde. https://doi.org/10.17868/strath.00089185
• Hannon, M., Gowens, R., Searle, R., Roberts, J. J., Cairns, I., Major, L. (2025) Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds, Strathclyde Institute for Sustainable Communities, University of Strathclyde. https://doi.org/10.17868/strath.00092494

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:

Capacity building is much needed in many communities.

Drawing on Strathclyde’s Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds (Hannon et al., 2025), we outline the following guidance to support capacity building for CBFs:

• Support (e.g. capacity building, mediation) to ensure the establishment and functionality of actors to lead community planning (e.g. Community Council, Development Trust).
• The development and utilisation of open-access training materials to support communities to lead participatory planning.
• Developers could offer advance CBF investments, prior to the project being fully operational, to support capacity building and training for participatory approaches and the development that supports planning. Examples include employing staff responsible to undertake community planning and peer-to-peer learning exchanges between communities to adopt good practice.
• Funds should enable funds to be devoted to capacity building. Including:
o Highlight if, and where, training is being offered. Where gaps in training provision are identified, these should be addressed with the development and provision of appropriate training programmes.
• Ensure a rotational membership of those within the decision-making group to promote a broader accrual and distribution of experience and skills.
• Provide the opportunity for the CBF decision-making body to co-opt members where appropriate to bolster knowledge and skills where lacking.
• Ensure that CBFs can provide core funding and flexibility that allows IOs to hire paid staff with prior training and experience, as well as to provide training to existing paid staff and volunteers.
• Ensure that when hiring volunteers, they fully understand the obligations within the legal agreements of the funds

o CBF decision-maker mentorship and good practice learning exchanges can help identify training needs and the value of putting this training into practice.

References

• Hannon, M., Gowens, R., Searle, R., Roberts, J. J., Cairns, I., Major, L. (2025) Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds, Strathclyde Institute for Sustainable Communities, University of Strathclyde. https://doi.org/10.17868/strath.00092494

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, funds should be flexible enough to support capacity building activities, including allowing payments to be brought forward to support capacity building activities.

As stated in Strathclyde's Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds (Hannon et al., 2025):

"Developers could offer advance CBF investments, prior to the project being fully operational, to support capacity building and training for participatory approaches and the development that supports planning. Examples include employing staff responsible to undertake community planning and peer-to-peer learning exchanges between communities to adopt good practice"

References

• Hannon, M., Gowens, R., Searle, R., Roberts, J. J., Cairns, I., Major, L. (2025) Guiding Principles and Actions for Enhancing Community Benefits from Community Benefit Funds, Strathclyde Institute for Sustainable Communities, University of Strathclyde. https://doi.org/10.17868/strath.00092494

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?

Not Answered

Please provide supporting evidence: