



Empowering Communities

Mr Simon Hodge
Chief Executive
Crown Estate Scotland
Quatermile Two
Second Floor
2 Lister Square
Edinburgh
EH3 9GL

15 February 2021 (by email)

Dear Mr Hodge,

I am writing in connection with the question of community benefits from offshore wind developments arising through the Sectoral Marine Plan for Offshore wind energy (SMP) and the current, and future, ScotWind leasing cycles.

Community Energy Scotland is a Registered Scottish Charity (Charity No: SC039673) and a membership organisation with over 400 non-profit distributing community group members in Scotland. Our aim is to strengthen and empower local communities by helping them to own, control and benefit from their local renewable energy resources, control and reduce their energy costs, regenerate their communities and play their part in the low carbon transition.

A number of our members have recently contacted us to discuss community benefits from Crown Estate Scotland leases, seeking to understand the current provision within leasing agreements and ensure future inclusion of community benefit arrangements. The affected groups expressed concern at the lack of engagement with their communities during the development of leasing areas and the absence of community benefit arrangements within ScotWind leases. The groups raised fears that developments will continue without consultation with, and support for, potentially impacted communities or that community benefit provisions will be token rather than meaningful and informed by local organisations.

Although it has been temporarily paused, we understand that the leasing auction is still live and that changes at this stage may not be possible. However, we note the planned iterative reviews of the SMP and thus the possibility of amendments to the plan and future leasing rounds. We feel the recently announced review of the option structure for ScotWind Leasing is an opportunity to reconsider the inclusion of community benefit within ScotWind leases.

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The SMP frequently mentions the importance of early community engagement and consultation and we commend this as an essential part of the development process. However, we note that community benefit arrangements are not mentioned within the plan and are not included within leases of the Crown Estate Scotland scoring process.

We fully support Crown Estate Scotland's intentions to delegate decision-making to local stakeholders and ongoing efforts of this nature such as the Local Pilot Scheme, but are disappointed that, in two recent cases in the Outer Hebrides, limited opportunities to engage with Crown Estate Scotland have been poorly promoted with no follow-up to address these shortcomings. We believe that more should be done to further this intention through the inclusion of community benefit requirements within ScotWind leases, and, indeed, this would appear to be entirely consistent with Crown Estate Scotland's wider policy of bringing benefits to coastal communities. Due to the failings in consultation, we understand that affected communities in the Outer Hebrides, for example, will be carrying out their own engagement with any prospective developers who wish to avail themselves of that opportunity.

As a manager of the seabed, it would appear to be within Crown Estate Scotland's gift to make local community benefit a requirement on all leaseholders and to be factored into their tenders. This would also align with Scottish Government policy such as the National Islands Plan (2019) by delivering fair, integrated, green and inclusive development of offshore sites by dedicating support to communities. As is mentioned in the plan and expanded upon in the Sectoral Marine Plan: Islands Communities Impact Assessment, island communities may be increasingly impacted by development of offshore sites.

We would be grateful if you could let us know what Crown Estate Scotland's policy is on community benefit and whether you have or will consider including the provision of community benefits as mandatory in future leasing rounds.

Yours sincerely



NICHOLAS GUBBINS
CHIEF EXECUTIVE

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