



Response to Consultation on Electricity Infrastructure Consenting in Scotland organised by the Scottish Government

By the ESRC funded research project 'Solar Power in the UK – Planning for a Sustainable Future' based at the University of Aberdeen. See website <https://solarplanninguk.wordpress.com/>

In general, we think that the consultation is timely and that the aims of the proposals to improve the quality of local consultation and to improve the speed of consultations are good ones. We note the overall aim of achieving a 'robust, timely and proportionate consenting process which meaningfully involves communities and relevant planning authorities in decision-making'. However, we wish to make some specific comments about the issue of consenting solar farm planning applications which are over the 50 MW of size.

Essentially, we argue that due consideration should be given to increasing the size limit beyond 50 MW whereby the local planning authority (LPA) is the principal planning authority. **We note that in England it is proposed (by the UK Government) to increase this limit up to 150 MW in respect of solar farms, and we believe that a similar limit should be considered for solar farms in Scotland.**

We believe that planning decisions about solar farm schemes up to 150 MW in size may be better considered by local planning authorities. Our research findings imply that this may be a democratic and effective way of proceeding. Therefore, we believe that this option should be given more serious consideration by the Scottish Government.

We note that the Consultation proposes to set clear guidelines about how local consultation and consultation with relevant stakeholders might be achieved. We note that a substantial minority of applications are said to lack sufficient relevant information and that new guidelines may hope to achieve a higher level of quality in submissions and therefore lead to more rapid conclusions in the consenting process. However, we also fear that there may be unintended consequences resulting from the creation of the larger compliance machinery that is proposed in the consultation (funded by a new set of fees to be charged to applicants). Whilst we appreciate the need to fund the provision of planning services by the Scottish Government, we also believe that provision of some of the services by local authorities may be a more effective and democratic path.

Centrally based administrators are not as well placed as local planners to assess the local issues affecting planning applications for solar farms. On the other hand, the amount of energy generated by solar pv schemes up to 150 MW may not be sufficient to justify it being regulated as a major generating station. For example, a fossil fuel or

nuclear generating facility of 50 MW is highly likely to deliver an annual output rather larger than a 150 MW solar farm given the low load factors of the latter.

We have researched, in depth, statistical associations between various factors and planning decision outcomes using the data on solar farms contained in the UK Government's 'Renewable Energy Planning Database' (REPD). When doing so we found that there was no correlation between decisions about whether to approve or refuse consent and the size of projects. Of course, we cannot make any firm conclusions about what would happen with projects over this size if the decisions were made by LPAs. However, what we can say is that there is nothing in the data evidence to suggest that LPA decisions would involve bias against larger solar farm sizes on account of their size.

Moreover, we did intensive research on the planning documents of a 300+ subset of the schemes. We found a high degree of professionalism and sensitivity to national planning policies as well as efforts to align the schemes to suit local preferences. We have confidence that LPAs would be an effective basis for being the principal planning authorities up to 150MW.

Local planning authorities already have a long-serving and experienced institutional set up for handling planning applications. They also collect fees from planning applicants to fund these operations. Set against this the proposed option of creating a larger central administration to organise and check compliance regarding, local planning consultations may well lead to duplication of resources. This will involve a double level of administration wherein the local authority is involved in consulting about the schemes, but the decisions and planning regime compliance is conducted at a different but remote central level. Doing as much as possible at the level of the local council may seem, therefore, to be an appropriate direction of practice. We therefore recommend that the Scottish Government establishes a further consultation to consider our suggestion.

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Dr David Toke, Principal Investigator, 'Solar Power in the UK – Planning for a Sustainable Future' 26/11/2024