

Email: Planning.Obligations@gov.scot

Planning, Architecture and Regeneration Directorate
Scottish Government
Victoria Quay, Edinburgh
EH6 6QQ

September 26, 2025

To Whom It May Concern:

Response to Planning Obligations and Good Neighbour Agreements: draft guidance

Scottish Renewables (SR) is the voice of Scotland's renewable energy industry. Our vision is for Scotland to lead the world in renewable energy. We work to grow Scotland's renewable energy sector and sustain its position at the forefront of the global clean energy industry. We represent over 360 organisations that deliver investment, jobs, social benefit and reduce the carbon emissions which cause climate change.

Our members work across all renewable technologies, in Scotland, the UK, Europe and around the world, ranging from energy suppliers, operators and manufacturers to small developers, installers, and community groups, as well as companies throughout the supply chain. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can provide solutions to help sustainable heat and power Scotland's homes and businesses.

SR appreciates the opportunity to provide feedback on the draft guidance for planning obligations. We commend PARD for its emphasis on quicker decision-making through this guidance update.

The one area where we recommend changing wording is where the viability of developments is validated through an open-book approach and review of financial modelling. We are concerned that local planning authorities may view the draft language as a mandate for negotiating the financial models of individual renewable energy projects. We recommend reverting to the previous language.

The purpose of a S75 agreement is to make a development acceptable. No part of the planning process should be based on how much a project can afford to pay to make the development acceptable. The language as drafted in this guidance could encourage local planning authorities to expect the sharing of financial modelling as a default. This will add complexity to the planning process when the test should be simple and focus only on what is required to make a development acceptable. It could also lead to scope creep, with planning

authorities applying different standards in the planning system based on what projects can afford rather than what is necessary to make the project acceptable.

This new language could lead to significant negotiation and delays in the planning process, which is the opposite of the desired outcome from the latest

guidance. An open-book approach should not be required where a financial agreement can be readily agreed upon between the local planning authority and the developer, based on the required infrastructure provision.

Scottish Renewables looks forward to working with you to ensure that this language balances the needs of renewable energy development with those of other developments that utilise S75 obligations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Megan Amundson', with a stylized flourish at the end.

Megan Amundson
Head of Onshore & Consenting
Scottish Renewables