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Streamlining Infrastructure Planning Consultation
Planning – Infrastructure Division
Ministry of Housing, Communities and Local Government
Third Floor SE, Fry Building
2 Marsham Street
London
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October 27, 2025

To Whom It May Concern,

Response to Consultation on streamlining infrastructure planning

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 380 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 sustainably heat and power Scotland's homes and businesses.

SR appreciates the opportunity to provide feedback on the consultation on streamlining infrastructure planning. While this consultation has minimal impact on Scotland, there are valuable lessons from onshore wind development in Scotland that can inform the UK Government's approach to streamlining the pre-application process and guidance.

While onshore wind has not been developed in England for a decade, onshore wind is a mature industry in Scotland. Onshore wind developers are well aware that early consultation with statutory consultees helps ensure a smoother planning process.

However, in Scotland, statutory consultees lack the resources to consistently engage in all pre-application processes for all renewable energy applications. Where pre-application consultation is available, onshore wind developers consistently use it. However, even when developers pay for the privilege of engaging in pre-application discussions with local planning authorities, they often receive little substantive feedback from the process to guide their

applications. With an increased volume of applications to review, agencies in England and Wales may face the same resource constraints.

Developers do not control statutory consultees' ability to participate in pre-application processes or the quality of their pre-application consultation when they do. Publishing guidance for developers, or even statutory requirements, will not address that core problem.

If the UK Government aims to streamline environmental assessments, it should consider the [guidance recently published by Scottish Renewables](#) in conjunction with the Scottish Government as part of the Scottish Onshore Wind Sector Deal. The goal of this guidance is to make environmental impact assessment reports (EIARs) more manageable for statutory consultees and communities to review. To achieve this, scoping down or scoping out potential environmental impacts is key. Developers need statutory and non-statutory consultees to also commit to doing so to deliver streamlined EIARs.

In Scotland, projects submitted under the Town & Country Planning (T&CP) Act require public consultation; those submitted under Section 36 of the Electricity Act do not, although good practice guidance encouraging public consultation exists.

Despite differences in statutory requirements, it has become standard industry practice for developers to undertake a similar public consultation for S36 applications as they would for a T&CP application. A report on this engagement will be submitted with a S36 application, and the Energy Consents Unit (ECU) has standard language acknowledging the receipt of these reports and confirming they meet the good practice guidance. It is also common for onshore wind developers in Scotland to consistently exceed the level of engagement set out in the guidance for public consultation.

Since developers already understand the benefits of engaging communities early, prescriptive guidance on how to do so is unnecessary. Developers already working in Scotland are accustomed to community consultation processes. Being too prescriptive in how that consultation happens will stifle innovation and creativity in meeting community members where they are. Often, multiple projects are proposed in the same communities, and consultation fatigue is a legitimate challenge. Allowing for creative ways to engage community members helps alleviate that challenge and ensures authentic feedback from communities.

We would welcome the opportunity to work with the UK Government to ensure changes to the planning system across the UK align where appropriate. Creating increased requirements for statutory pre-application and acceptance in Scotland while removing similar requirements in England and Wales creates a skewed playing field that will impact the UK's ability to achieve Clean Power 2030 ambitions.

This, along with the higher cost of development in Scotland due to substantially higher TNUoS charges, threatens 2030 ambitions in Scotland, which the UK needs to fulfil to meet UK-wide goals.

We would encourage the UK Government not to create statutory requirements for the pre-application process in Scotland, in line with removing the statutory requirement in England. Guidance in England and Wales need not be heavy-handed, since the industry already understands the benefits of pre-application consultation.

Should you have any questions about how the industry is working with communities or statutory consultees in Scotland, we would be happy to provide more information or examples.

Sincerely,

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

Megan Amundson
Head of Onshore & Consenting
Scottish Renewables