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March 27, 2026

To Whom It May Concern,

**Response to Onshore electricity generation: Consultation on increasing the threshold for applications under the Electricity Act**

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 sustainably heat and power Scotland's homes and businesses.

SR appreciates the opportunity to provide feedback on the proposal to increase the threshold for applications under the Electricity Act 1989. We strongly recommend keeping the threshold at 50MW for all technologies so Scotland can achieve its net-zero and energy independence ambitions.

The following key points highlight our members' concerns about an increase in the threshold for Electricity Act (1989) (EA) applications:

- For Scotland to achieve its net-zero and energy security ambitions, the planning system needs to support a rapid increase in renewable energy generation between now and 2035. Projects over 50MW are defined in NPF4 as National Developments, which underscores the national importance of infrastructure projects of this size. NPF4 should align with the EA, and those nationally important applications should be handled by Scottish Ministers rather than by local planning authorities.

- Should the EA threshold change, developers of large projects that would fall under a new threshold and go through Town and Country Planning (TCPA) rather than the EA would lose the powers afforded to them by the EA. Losing these powers could impact the ability to deliver projects.
  - The ability to use Compulsory Purchase Order (CPO) powers: A change in the threshold would limit the ability of large projects that fall under the new threshold to access CPO powers. This could materially harm the ability to deliver projects in Scotland.
  - Streamlined Public Local Inquiry (PLI): The Planning and Infrastructure Act provides powers to the Planning and Environmental Appeals Directorate (DPEA) to evaluate and reduce the resources required for PLIs under the EA by removing the automatic trigger for LPA objections, whilst retaining Ministerial oversight and scrutiny of nationally significant projects. This new process is intended to allow Reporters greater flexibility in determining a proportionate process for a PLI. A change in the threshold would mean that large projects under the EA threshold would not benefit from the streamlined appeals process or consistency of Ministerial decision-making. This would mean that more applications would incur the additional costs and time required for TCPA appeals and delayed planning determinations.
- In 2025, the Energy Consents Unit (ECU) more than doubled in staff to address the increasing volume of applications. The unit is also divided into specialist teams focused on different technologies, with the technical expertise needed to process complex energy generation applications. By contrast, local planning authority (LPA) planning teams are increasingly constrained; expected to process all planning applications, not just energy-related applications; and have fewer opportunities to develop specialist expertise in complex energy projects. Increasing the number of applications through LPAs will put even greater strain on the planning system, particularly in LPAs where planning applications are already stalled.
- We appreciate that the genesis of this consultation is in response to communities wanting more control over planning decisions. We believe this concern has been addressed more effectively through the Planning and Infrastructure Act powers than any proposal to change the threshold for EA applications.
- Should the threshold for EA applications change, the increase in applications through TCPA would be focused on a small number of LPAs rather than being distributed evenly across Scotland. The LPAs in question are already struggling to respond to EA applications as statutory consultees. The additional work of determining so many more applications would create an even greater strain on their local planning resources.
- Renewable energy applications that go through TCPA are more likely to be opposed by the LPA and go to appeal, making the determination timeline longer than the

timeline under the EA. It also significantly increases the cost of the planning process. In the end, determinations on appeal are made by Reporters or Ministers, and communities still do not have control over them.

### **Providing developers with consistency**

What industry requires when developing renewable energy projects is predictability and consistency in the planning system. For large and complex renewable energy projects, a specialist national consenting route ensures a consistent process and well-resourced access to technical expertise. Decisions remain case-specific and evidence-led, within the legal framework, including Schedule 9 duties to consider amenity and mitigation. Changing the 50MW threshold would not address the community concerns motivating this consultation.

Some projects also span multiple LPAs for the extensive infrastructure required for large-scale turbines or solar farms. Because different LPAs may have different guidance, requirements, or political considerations, working across LPAs through TCPA would increase application complexity due to inconsistent policy application. The coordination among multiple LPAs is better done through central government, which can more consistently apply policies to large-scale projects, making the planning system more efficient. For example, the need for comprehensive grid reinforcement is a national issue that requires a coordinated response beyond local planning boundaries.

The ECU has also encouraged LPAs to use standard conditions for Section 36 (S36) applications, as agreed in the Scottish Onshore Wind Sector Deal. LPAs are not signatories to the Onshore Wind Sector Deal and are not compelled to use the standard conditions. Increasing the number of applications that are not approaching conditions according to the ECU's standards would reduce consistency in approach, increasing the time required to negotiate and discharge conditions, thereby increasing project costs.

### **Community voice in planning**

One of the reasons for this consultation is to ensure that community voices are respected in the planning decision-making process. We support initiatives that allow communities to be heard during planning, but increasing the EA threshold is unlikely to accomplish that objective.

The Planning and Infrastructure Act 2025, which came into effect on February 18, 2026, introduces changes specifically aimed at addressing the concern that communities are not sufficiently engaged in EA applications before they are submitted. This includes a statutory process for pre-application consultation with communities and a tailored, reporter-led process for public inquiries. These changes are designed to enhance community involvement in nationally important renewable energy applications. Further details on how these

improvements will be implemented will be provided through secondary legislation from the Scottish Government later this year.

As an industry, we recognise and value the importance of community participation. Given the increasing volume of community representations on energy projects, we support implementing better tools and processes to ensure that every submission is handled fairly and efficiently, without consuming disproportionate planning resources. For example, the ECU received approximately 12,000 representations for the most recent Accelerated Strategic Transmission Investment (ASTI) project, and another EA application garnered around 8,000 representations. The ECU has hired five temporary staff members out of its total of 79 employees solely to manage the review and processing of these community representations.

To alleviate this resource strain, the ECU launched a new portal for community representations regarding EA applications on January 16, 2026. LPAs have not had the same ability to invest in tools to manage efficient, proper handling of these representations. If the volume of renewable energy applications processed through TCPA increases, LPAs would need to consider additional resources required to process community representations in addition to the additional planning capacity required to process those applications.

### **Investments in planning**

Since the signing of the Scottish Onshore Wind Sector Deal (SOWSD) in September 2023, the Scottish Government has invested in streamlining the determination timeline for applications going through the ECU. This has resulted in more than a doubling of ECU staff, from 35 to 79, at the time of this consultation. Changing the EA threshold would undermine Scottish Government's goal of streamlining determinations.

Analysis by BiGGAR Economics (Annex Three) demonstrates that a one-year delay in planning consent will increase the cost of an onshore wind project by 10%. Interest on debt payments for an additional year would cost a 100MW project £400,000. If that were calculated across every project currently in the planning system, a one-year delay on every project would cost developers and ratepayers £36.8 million in additional interest payments on debt alone. Those increased costs from delayed consent would not be limited to debt payments, but could also include the cost of missing a CfD auction round and increased supply chain costs. These additional costs impact project viability at a time when many renewable energy projects are marginal.

The ECU has invested in enhancing its staff's technical expertise and improving the efficiency of its processes to streamline planning, as the Scottish Government committed to doing in the SOWSD. Only the ECU has made the necessary financial investments in staffing and process efficiencies to ensure the planning system works efficiently for large energy projects. We appreciate the challenge of resourcing LPAs when they receive only a portion of the

planning fees for S36 applications as statutory consultees. However, given that planning fees in TCPA applications are not ringfenced for local planning departments, there can be no guarantee that LPAs receiving full planning fees through TCPA will lead to better staffed LPAs to handle the increased volume of applications.

Should the EA threshold increase, the resulting increase in application volume would not be evenly distributed across LPAs. Based on current projects in the planning system, the following LPAs would see the bulk of the increase in caseload. They also have significantly longer response times than other LPAs.

- Argyle & Bute: Current average response rate 304 days; caseload increase of +64% at 100MW threshold.
- The Highland Council (THC): Current average response rate 361 days; caseload increase of +59% at 100MW threshold.
- Scottish Borders: Current average response rate 529 days; caseload increase of +64% at 100MW threshold.
- Dumfries & Galloway (D&G): Current average response rate 608 days; caseload increase of +62% at 100MW threshold.

Many LPAs require lengthy extensions to respond to S36 applications today, and an increased TCPA workload would slow down the planning process at a time when there is agreement that planning decisions on renewable energy applications should be determined at pace.

An analysis of LPAs' response rates by Michaela Drummond at ScottishPower Renewables (Annex Two) shows wide variation in the time it takes them to respond from the issuance of the consultation request to the first substantive LPA response. The minimum recorded response was 90 days, with the maximum being 1,318 days (more than three and a half years). The average response timeframe was 414 days.

This analysis also demonstrates that objections to applications do not predict the time required to respond to them. The variation in response times is more likely to be caused by systemic pressures, such as competing workloads, resource constraints, and the cumulative complexity of overlapping energy and grid programmes. Efforts to address these systemic concerns, such as the Planning Hub, have had a localised impact for the LPAs that have utilised its services, but not yet a widespread structural impact on the planning system.

Currently, LPAs struggle to address the volume and, in some cases, the complexity of TCPA applications for renewable energy and grid infrastructure. THC, where many of the renewable energy and grid infrastructure projects are focused, communicated to developers in August 2025 that it was putting all renewable energy applications on hold to focus ASTI grid reinforcement projects.

Delays in planning application processes for other policies are a consistent concern. This occurred in D&G when the proposed National Park was under consideration. Developers reported that their efforts to initiate pre-application processes and consult with D&G went unanswered for over a year as D&G waited for a decision on the National Park proposal. This delay was primarily due to uncertainty about planning policies for onshore wind development within the proposed new National Park.

If LPAs are unable to keep up with the volume of applications as statutory consultees to EA applications, there is no indication that they would be able to determine applications faster than the ECU. In fact, the evidence provided here, from experience in the two LPAs most likely to receive renewable energy applications, indicates that LPAs would be significantly slower than the ECU in making determinations. This is contrary to the goal of determining renewable energy projects at pace and the efforts being made in the Planning and Infrastructure Act to streamline the planning system.

This time delay adds uncertainty and cost to developers and to consumers once projects are built. Communities also express increased frustration when applications remain in the planning system for extended periods. BiGGAR Economics' analysis (Annex Three) finds that lengthy planning processes erode community members' trust in the system and undermine positive relationships developers work to build with them.

Finally, LPAs can object to planning applications under either the TCPA or EA. TCPA applications do not give community voice more weight. Whether the application is processed under EA or appealed under TCPA, the final decision is often made by central government.

### **Post-NPF4 analysis of determination timelines**

James Gibson of Eversheds Sutherland has provided an analysis of determination timelines for TCPA and EA applications since the passage of NPF4 (Annex One).

This analysis indicates a significantly higher risk that LPAs will reject onshore wind energy applications processed through the TCPA. Since the implementation of the NPF4, the likelihood of refusal for an onshore wind project is twice as high under the TCPA as under the EA process. Additionally, at the time of this analysis, approximately 63% of onshore wind applications under Section 36 (S36) faced objections.

LPAs frequently object to or refuse renewable energy applications, regardless of whether the project is processed through the TCPA or the EA. Despite these objections, Ministers or Reporters often grant consent for these projects. Furthermore, the additional time required for appeals of refused TCPA applications means the overall timeline for TCPA applications is no quicker than that for S36 applications.

## **How renewable energy projects are developed**

This consultation suggests that developers may be adjusting their projects to qualify for the TCPA instead of the EA process. However, this does not accurately reflect the reality of how renewable energy projects are developed or the primary factors that influence their development. The choice of planning system through which a project will be processed is not the primary consideration of how projects are developed.

The major considerations in project development are renewable energy resource availability (such as wind speed), land availability, grid connection availability, and the site's accessibility for construction and maintenance. Developers will also consider how to maximise the generation capacity of their sites.

Following NESO's reform of the grid connection queue process and the subsequent need for energy infrastructure to align with either the Clean Power 2030 Action Plan or the Strategic Spatial Energy Plan (SSEP) to secure a grid connection, grid connection availability has become the dominant factor in project development. This means that developers will not put new projects into the planning system unless they have certainty that there is grid connection capacity in the region for their project.

Even if developers were manipulating technology proposals for a site and using the co-location of multiple technologies to influence whether a planning application goes through the TCPA or EA, this may no longer be possible under the SSEP. Capacity and grid offers are determined by each individual technology. Therefore, developers will propose co-location projects only if there is sufficient capacity for all technologies they intend to use on the site in the SSEP.

We know from recent NESO offers that some co-location projects will not proceed because different technologies have received different grid connection dates. This makes many co-location projects commercially unviable, as their business model requires both technologies to connect simultaneously. This issue will be particularly significant for solar projects in Scotland, which depend on battery energy storage systems (BESS) to offset high grid charges and remain economically viable.

The ability, or lack thereof, to secure grid connection dates across different technologies will be the main factor determining whether developers pursue co-located projects, rather than the planning system itself.

It is important to note that the majority of planning applications in the range of 49-49.9 MW are for BESS projects. Historically, these projects have been less controversial at the community level compared to other renewable energy initiatives. Additionally, BESS projects are generally less expensive to build than energy generation projects. These factors have

meant that BESS projects would benefit from using the TCPA, as objections were relatively rare. However, this trend has changed, and our members who develop BESS projects are also seeking the consistency of an S36 application, should there be capacity to build BESS projects in the SSEP. However, BESS is already oversubscribed in the grid queue for Scotland due to capacity limits outlined in the Clean Power 2030 Action Plan, and LPAs will likely see fewer new BESS applications enter the planning system.

### **A change to the EA threshold in England and Wales**

Whilst this consultation proposal does not mention the change in the EA threshold in England and Wales as a reason for changing it in Scotland, it is important to explain why increasing the threshold in England and Wales will yield a different outcome than an increase Scotland.

In England, the Development Consent Order (DCO) process for nationally important infrastructure projects, which is England's EA planning process, is significantly more expensive and time consuming than applications that go through TCPA. The changes proposed to the planning system in England over the last year have been introduced specifically to address that difference. The cost and timeline differences between TCPA and EA applications do not exist in Scotland.

The increase in the EA threshold in England to 100MW was supported by the solar industry but not the onshore wind industry. However, now that England is open to onshore wind development, onshore wind developers have worked with the UK Government to retain the ability to apply for projects under 100MW to go through the more predictable DCO process via the Secretary of State.

The Scottish Government's proposal does not provide developers with a similar option to allow projects under the EA threshold to apply to be considered as a S36 application. So, while increasing the threshold to match the UK Government's may, at first glance, appear to create parity, the systems will not function the same, and the Scottish Government will be disadvantaging Scottish projects in the planning system compared to English projects. This could impact the investability of Scottish projects.

We would welcome the opportunity to discuss these points in more detail. Please do not hesitate to reach out with any questions.

Sincerely,



Megan Amundson

**Head of Onshore & Consenting | Scottish Renewables**

## Consultation Questions

Question 1: Should there be a single threshold applicable to all technologies?

Yes, there should be a single threshold for all applicable technologies. Our members have confirmed that, across all technologies, developers prefer to go through the Electricity Act for all projects over 50MW.

Question 2: What threshold should apply for applications for electricity generation to be determined by planning authorities?

50MW

(See above.)

Question 3: Any change to the threshold would apply only to new applications. Do you have any comments on transitional arrangements?

1. We would recommend following the transitional measures laid out in England, which would allow for a 1 to 2 year period for projects that are currently about 50MW but below 100MW.
  - **Consented:** The consent would stay in place under the existing decision notice. Any conditions or consent variations should continue to be processed under this regime and remain subject to it thereafter, even out with the transitional period.
  - **Yet to be determined:** These projects will be able to decide which regime they use. Any conditions or consent variations should continue to be processed under this regime and remain subject to it thereafter, even out with the transitional period.
  - **Yet to be submitted:** These projects will be able to decide which regime they use. And this decision shall endure, after the transitional period.
2. Exporting Capacities: Projects with planning consent under 50MW, consented as part of the Town and Country Planning Act prior to this change, shall be allowed to generate, regardless of the description of development (which may limit this generation capacity), above 50MW from the constraints of its previous permission granted with an exporting capacity of 50MW. This would benefit the UK Government's targets as well.

Question 4: Do you have any other comments to add?

See above.

[Question 5: Do you have any comments on the partial and draft impact assessments undertaken?](#)

The Business and Regulatory Impact Assessment (BRIA) requires further detailed analysis to reflect the impact on applicants. We would request that it include the following:

**Impact on delayed decision-making:** We have provided an analysis of the financial impact of delayed planning determinations on renewable energy projects by BiGGAR Economics (Annex Three). For a BRIA to be effective, it would need to quantify the cost of increased delays in the planning system because LPAs do not have the capacity to handle the volume of applications they receive.

**Cost impact on appeals:** Our data shows that LPAs have a higher refusal rate for onshore wind applications. Should more applications go through TCPA, one could extrapolate that the current refusal rate would apply to more projects, requiring more projects to go to appeal, increasing the cost of the planning process for those projects. That cost is not calculated in the BRIA.

**Impact on cost viability:** Changes in the consenting authority may affect the financial viability of projects, particularly marginal ones.

**Opportunity costs:** If renewable energy projects become unviable for Scotland due to changes in the consenting authority and associated additional costs, there would be a significant loss of economic activity. This should be factored into the analysis.

In the absence of this additional analysis, the BRIA may not fully capture the impact that a higher threshold for determination by Scottish Ministers could create for developers of Nationally Significant energy projects.

[Question 6: Do you have any suggestions for additional sources of information on the potential impacts of the proposals that could help inform our final assessments?](#)

Please see the attached three annexes:

Annex One: Consent determination timeline analysis from James Gibson at Eversheds Sutherland.

Annex Two: Consent determination timeline analysis from Michaella Drummond at ScottishPower Renewables.

Annex Three: Economic analysis by BiGGAR Economics on the economic impact of delayed planning determinations on onshore wind projects.

## Wind Energy Consenting: Increasing S36 Threshold to 100MW and Sector Deal Progress

### Introduction

This study shows comparable data between local applications and planning appeals, and S36 applications from NPF4 adoption (13 February 2023) to 16 September 2025. The local applications and planning appeals data is taken from six local authority areas: Highland, Dumfries and Galloway, South Lanarkshire, East Ayrshire, Aberdeenshire, and Argyll and Bute. The purpose of the data presented is to consider the implications of increasing the minimum generating capacity for S36 applications.

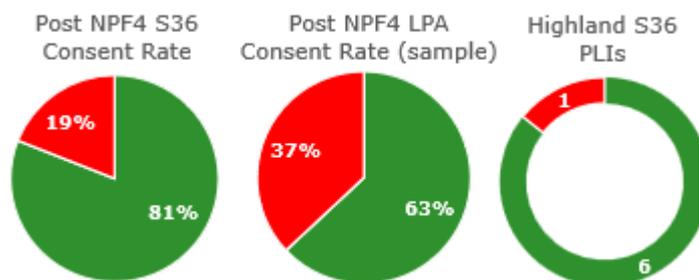
This study also evaluates timescales for S36 decision-making in the context of sector deal commitments. The study again evaluates decision making data from NPF4 adoption (13 February 2023) to 16 September 2025.

### Executive Summary

**The study demonstrates that there would appear to be a materially higher risk of refusal of wind energy applications by local authorities, and that the rate of objection to 50MW+ projects is high: indicative that delegating more S36 applications (up to 100MW) to local authorities will materially increase the rate of refusal of projects. It also demonstrates that there is almost no improvement in the timescales for determination of local applications and planning appeals versus S36 applications. Accordingly there is limited evidence to suggest that the delegation of more applications to local authorities (indeed some of the largest and most complex projects) would speed up decision-making. On the contrary, factoring in resource constraints, it is reasonable to assume that determination timescales may become more prolonged.**

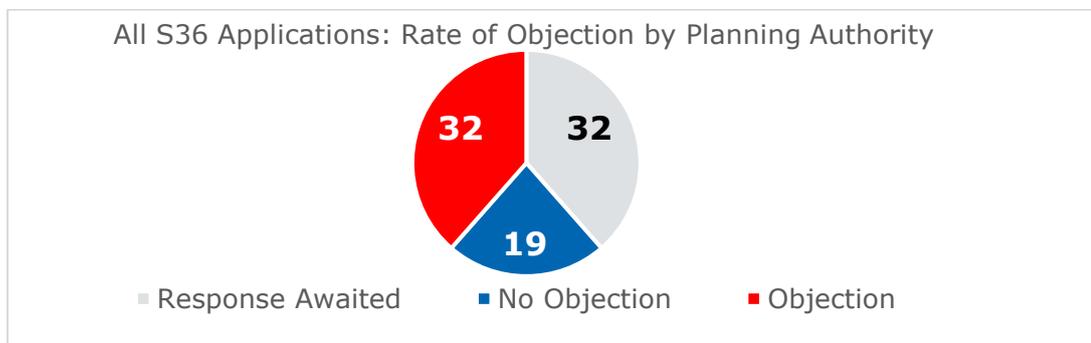
**With respect to S36 determination timescales post NPF4 adoption, S36 applications are still taking too long to decide. Notwithstanding being two years into the sector deal, determination timescales in 2025 are similar to the average across the period since NPF4 adoption. This indicates that more action is required to speed up decision-making.**

### Consent Rate



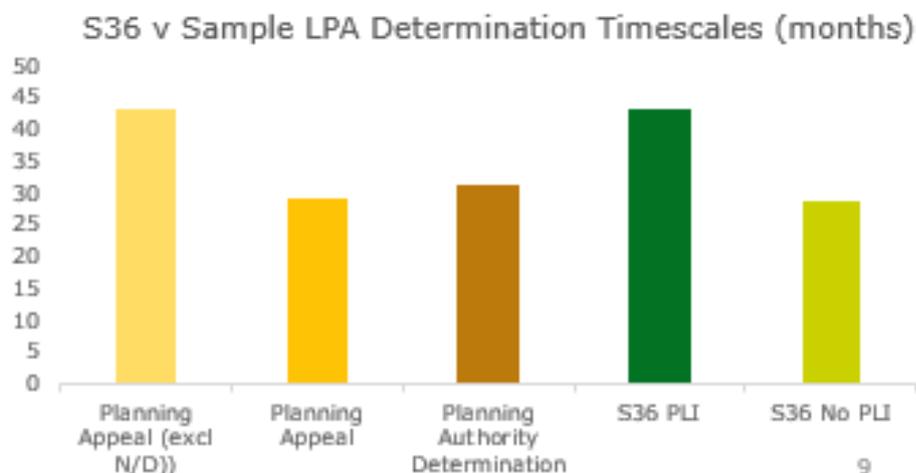
1. Post NPF4, 19% of S36 Applications have been refused. The refusal rate for local wind planning applications increases to 37% across the host authorities sampled. **This means that, since February 2023, there is around double the risk of refusal when making a wind energy application to a local authority relative to the ECU.**
2. Looking more closely at S36 Applications in Highland, there have been seven decisions that were objected to by the Highland Council that were subsequently the subject of a PLI. Six of those projects were consented by the Scottish Ministers. Or put another way, only one project

was the subject of a PLI where the Scottish Ministers agreed with the Council objection. **This means that, since February 2023, around ½ GW of wind energy development would likely have been refused (in Scottish Ministers view wrongly) had the S36 application been the subject of a local planning application.**



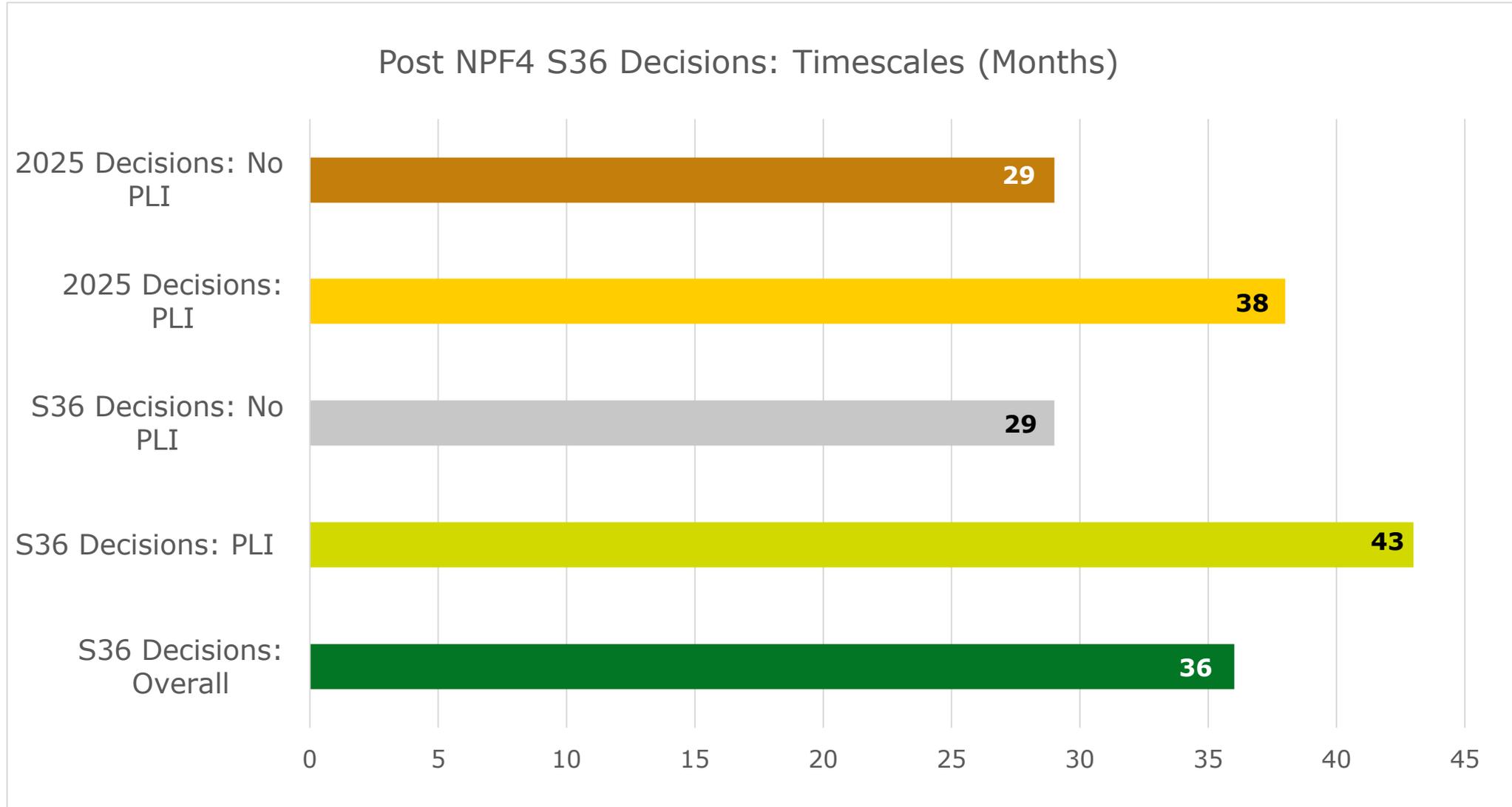
- There are 32 outstanding local authority objections across the live S36 applications identified on the ECU portal. The same number are awaiting a response from the local authority. 19 projects have no local authority objection. Based on local authority responses received, there is an objection rate of approximately 63%. Some objections will be capable of being resolved by conditions / other statutory consultee responses, or are stated to be "holding objections". However many of the objections will not be capable of being resolved in order for objections to be withdrawn. **This indicates that many more wind projects would be refused if subject to local decision-making.**

### Decision Timescales



- Data since February 2023 across the sampled local authority areas indicates that planning authorities are taking longer to determine wind energy planning applications than the Scottish Ministers where there is no PLI. Across all applications that are the subject of a planning appeal, the determination timescales are similar to a no-PLI S36 application. However, when non-determination appeals are excluded (i.e. a developer – as is encouraged – waits on the local decision before lodging an appeal) the timescales are similar, in fact slightly longer, than a S36 application with a PLI process. **This indicates that delegating more planning applications to the local authority would not improve decision-making timescales. On the contrary, the likelihood of delegating some of the largest and most complex wind energy applications to the local authority may materially extend decision-making timescales.**

Sector Deal Progress: S36 Determination Timescales



5. The average for determination of all S36 applications post NPF4 adoption is approximately three years. Projects that require PLI are, as expected, in the system even longer: over three and a half years. Where there is no PLI, it is still taking around two and a half years to get a decision based on the evidence since February 2023.
6. Covid restrictions and new national policy “bedding in” delayed many S36 applications prior to their post-NPF4 determination date. With these issues having been addressed prior to more recent applications being submitted, paired with the signing of the sector deal in Autumn 2023, there was some expectation of faster decision-making. The evidence from 1 January – 16 September 2025 would suggest otherwise. Determination timescales for applications with no PLI are still over three years. Where there is no PLI, we are still averaging approximately two and a half years (the same average as across all no-PLI s36 applications since NPF4 adoption in February 2023). Notwithstanding the limited evidence base, there is a marginal improvement in timescales where there has been a PLI: 38 months in 2025 relative to an average of 43 months across all S36 decisions with a PLI since NPF4 adoption.
7. **This means that, whilst it is important to recognise more positive decision-making since NPF4 adoption and the sector deal being signed, there is little evidence to suggest that decisions on the largest wind energy decisions are being made faster. Accordingly more work is required to address these matters. As evidenced by the first part of this study, there is limited evidence to suggest that the delegation of more wind energy applications to local authorities would address this issue.**

**Eversheds Sutherland (International) LLP**

**4 November 2025**

## Annex Two:

# National Thresholds and Local Capacity: An Empirical Study of Section 36 Onshore Electricity Applications in Scotland

RESEARCH CONDUCTED BY MICHAELLA DRUMMOND SENIOR PLANNING AND AVIATION ANALYST AT SCOTTISHPOWER RENEWABLES.

**Key findings:** The median interval between a consultation being issued and a local authority's first substantive response is 334 days, with the upper quartile at 578 days and at least one authority taking over 1,300 days. This pattern is not driven by the characteristics of individual schemes, regression analysis found no statistically significant project-level predictors of delay, but by structural capacity pressures concentrated in a small number of authorities. Under a 100 MW threshold, 44 of 89 active schemes currently handled by the Energy Consents Unit would transfer to local determination; under 150 MW, 63 would transfer. In both scenarios, the majority of additional cases would fall to Highland, Dumfries & Galloway, Argyll & Bute and Scottish Borders – the same four authorities that already record the longest median response times in the dataset.

Debate surrounding the appropriate threshold for national determination of onshore electricity generation has intensified as Scotland seeks simultaneously to accelerate decarbonisation and to maintain a plan-led, participatory planning system.

This annex provides an empirical assessment of that proposition using a bespoke dataset of recently determined and live Section 36 onshore wind and collocated applications. It examines how local authorities respond in practice to consultations on largescale proposals and addresses three core research questions:

1. How would raising the national threshold reallocate caseload among local authorities, and what implications would this have for timeliness and capacity?

2. How long do local authorities take to issue an initial substantive consultation response, and how does this vary across Scotland?
3. Do observable project level characteristics: such as scheme scale, formal objection, or landscape designation, correlate with delay?

The findings are directly relevant to current Scottish Government consultation on thresholds and to wider debates about planning capacity in Scotland. They show that response and determination times for large onshore schemes are often lengthy, that performance varies substantially between authorities, and that raising the threshold would concentrate additional in-scope caseload in a small group of already heavily engaged authorities. At the same time, regression analysis fails to identify a single, statistically robust driver of delay at project level, suggesting that timeliness is better understood as a system-level capacity issue than as a function of individual scheme attributes.

## Data and Methods

### Dataset construction

The analysis draws on a bespoke audit of 140 onshore windfarm and co-located schemes submitted under Section 36 of the Electricity Act 1989 following the implementation of National Planning Framework 4 (NPF4) on February 13<sup>th</sup> 2023. The data was manually collected via publically available documents filed on the Energy Consent Unit, DPEA and individual developer websites. The data is correct as of March 1<sup>st</sup> 2026.

For each scheme, detailed descriptive, procedural and temporal attributes were collated and compiled generating over 50 variables. This includes:

- Energy Consents Unit (ECU) reference and project name;
- Developer, installed and applied capacity (MW), turbine number, height and variation through planning from submission to determination;
- Co-location characteristics, where applicable;
- Host and secondary local authorities;
- Key dates of submission, consultation and determination;
- Flags for main determining issues, including landscape designation, peatland, aviation, ornithology and historic environment;
- Procedural features such as consultation extensions, local authority objection and whether a Public Local Inquiry (PLI) was held.

Two temporal variables underpin the empirical analysis:

1. Days to first consultation response; the number of days between the ECU issuing the initial consultation request and the local authority's first substantive response;
2. Time to ministerial decision; the number of days between application submission and final decision by Scottish Ministers.

The dataset includes both active and determined cases since the implementation of NPF4. For analyses of response times, entries tagged as being in consultation only (for example where Case Status Type indicates a consultation stage without full decision data) were excluded, on the basis that response-time metrics for these cases are incomplete or not yet available. These consultation-stage cases were nonetheless retained for exploratory “what if” allocations under alternative threshold scenarios.

## Limitations

It is understood that there are limitations to the use of ‘days to first consultation response’ as an indicator of local authority performance. In practice, the timing of formal response is shaped not only by the authority's own capacity, but also by factors such as the completeness of the original submission and the need for additional environmental and technical information from the applicant from design iterations that are expected in the consultation process. These dynamics mean that elapsed time to responses cannot straightforwardly be attributed to the authority alone. For this reason, the present analysis focuses on the initial consultation response rather than subsequent exchanges, where cycles of further information or clarification are more likely to reflect applicant driven revisions, evolving project design or external interdependencies. This approach does not eliminate ambiguity, but it offers a more conservative and transparent measure of delay. The variable is therefore measured in days from the day a local authority receives an application for consultation, to the day they first respond, often in line with the timelines granted by extension requests.

## Variable definitions

Several derived variables were created for descriptive and regression analysis. Host authority caseload was defined as the count of Section 36 applications in the dataset falling within each local authority. Applied capacity was banded into three ranges: 50–<100 MW, 100–<150 MW and 150 MW or above, to mimic cohort shifts under hypothetical 100 MW and 150 MW thresholds. Local authority objection was recoded as a binary variable, with 1 for “Yes” and 0 for “No”.

Landscape designation as a main determining issue, originally recorded in a detailed categorical field capturing combinations of National Scenic Area (NSA), National Park, Wild Land, Regional Scenic Area, Special Landscape Area and local designations, was simplified for regression purposes into a binary variable indicating whether any considered designation applied. Application type was retained as a categorical variable distinguishing new proposals, repowering, extensions and re-applications.

## Descriptive analysis

Descriptive statistics were calculated for key timing variables across the whole sample and by host authority. For days to first consultation response and time for decision, mean, median and upper quartile values, alongside simple ranges. At authority level, the study reports count of in-scope applications, median response times and mean applied capacities to illustrate how volume and complexity are distributed geographically.

To explore the potential impact of threshold uplift, the dataset was reclassified under hypothetical 100 MW and 150 MW national thresholds, identifying the applications which would have fallen to local determination and how these would be distributed among authorities. Because the underlying sample is drawn from Section 36 cases at or above 50 MW, the analysis does not attempt to infer the total national stock of smaller TCPA schemes but instead focuses on relative changes within the observed cohort.

## Regression analysis

Regression analysis was undertaken to explore whether variation in local authority response times could be statistically associated with a set of observable project-level characteristics. The dependent variable was the number of days taken to issue a first substantive consultation response. The model incorporated four explanatory factors selected for their relevance to current policy debate: host authority caseload; application generating capacity, expressed through three capacity bands; the understanding of main determining issues; and whether the host authority lodged a formal objection.

Cases with incomplete information were excluded on a listwise basis, resulting in a final sample of 88 schemes (63% of the full dataset). The excluded cases were predominantly those at early consultation stages where a formal response had not yet been issued at the time of data collection; missingness is therefore largely a function of case timing rather than a systematic characteristic of particular authorities or application types.

Given the modest number of observations, the modelling approach was deliberately parsimonious, avoiding stepwise procedures and instead focusing on variables that map directly onto widely cited explanations for delay. The regression therefore serves primarily as a robustness check on descriptive impressions rather than as a tool for prediction.

## Results

### Overall response and decision times

Descriptive statistics across the full dataset indicate that both early-stage consultation and overall determination processes for Section 36 onshore wind and collocated applications are subject to substantial temporal delays. Among 88 cases with complete consultation response data, the median interval between the issue of the initial consultation request and the first substantive local authority response is 334 days (just under eleven months), with a mean of 414 days. The minimum recorded response was 90 days; the maximum was 1,318 days (over three and a half years). The distribution of response times exhibits a pronounced right tail, with the upper quartile at 578 days (approximately nineteen months) and at least one authority taking longer than three and a half years to provide an initial response. This distribution is shown in Figure 1 below.

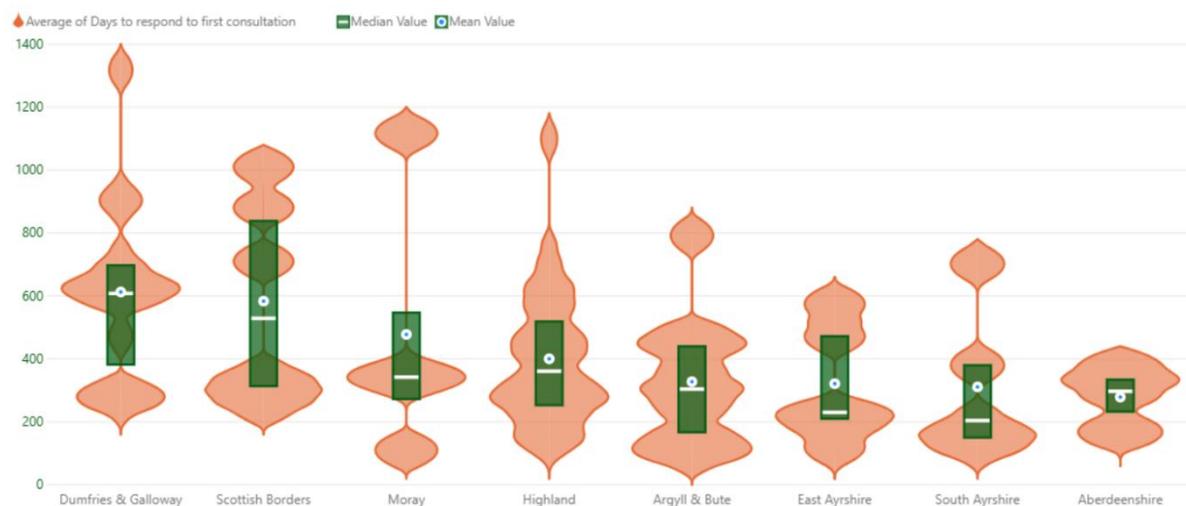


Figure 1: Distribution of days to first local authority consultation response for Section 36 onshore wind schemes (post-NPF4, n = 88). The distribution is strongly right-skewed; the median is 334 days. See Figure 2 and Table 1 for authority-level detail.

These extended durations are not isolated anomalies but form a recurring pattern across multiple local authorities, suggesting that long consultation lead times are characteristic of the system rather than symptomatic of a small set of atypical cases.

The pattern is mirrored, and amplified, in the time taken from application submission to ministerial decision. As expected for large and often multi-authority schemes, determination periods exceed those observed for initial consultation responses and display similar right skewed characteristics. While the median time to decision is shorter than the most extreme cases might imply, the presence of a substantial group of outliers, schemes that progress through the system markedly more slowly, indicates considerable variability in procedural throughput.

Collectively, these descriptive results underscore a system operating under considerable temporal strain. They highlight that delays are not confined to the most complex or objected schemes, nor to particular moments in the consenting process, but rather span both the consultation and decision phases.

## Variation Amongst Local Authorities

The local authority level analysis reveals pronounced spatial heterogeneity in both the distribution of Section 36 caseload and the pace of consultation responses. A relatively small subset of local authorities account for a disproportionately large share of in-scope applications. Their median response times tend to be significantly longer than those observed elsewhere, with Dumfries & Galloway recording the longest median in the dataset at 608 days (upper quartile: 698 days); Scottish Borders at 529 days (upper quartile: 838 days); Highland at 361 days (upper quartile: 519 days); and Argyll & Bute at 304 days (upper quartile: 440 days). By contrast, authorities with limited Section 36 exposure – such as Stirling (119 days) and North Ayrshire (118 days) – record substantially shorter medians, though with small sample sizes. Full authority-level data is presented in Table 1. This pattern suggests a strong association between the intensity of onshore energy development in a given area and prolonged consultation timelines, even though, as the regression analysis later indicates, this relationship does not manifest in a statistically linear form.

Crucially, the concentration of both caseload and lengthy response times within the same cluster of authorities suggests that existing capacity pressures are neither marginal nor incidental. Instead, they appear to be structurally embedded in those parts of the planning system most exposed to the national decarbonisation agenda. For the purposes of the threshold debate, this finding carries significant implications. If higher thresholds were to shift a greater proportion of large schemes into local determination, additional workload would almost certainly be absorbed by the same authorities already demonstrating the slowest median response times. The descriptive evidence therefore highlights an

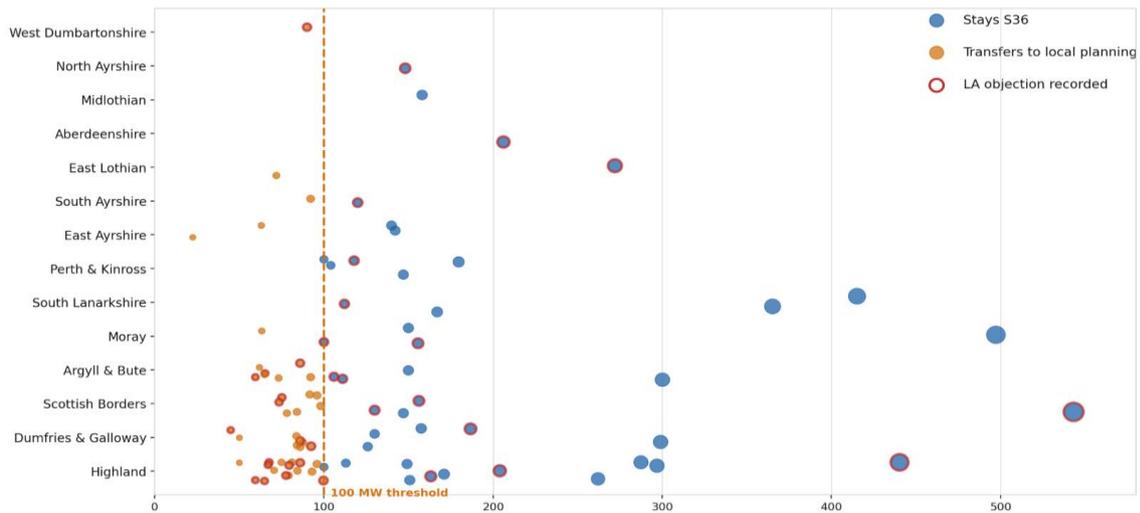
inherent tension between threshold uplift and the objective of improving decision timeliness: the authorities most affected by such a reform are those least likely to be able to process additional cases without further delay.

## Threshold scenarios and caseload concentration

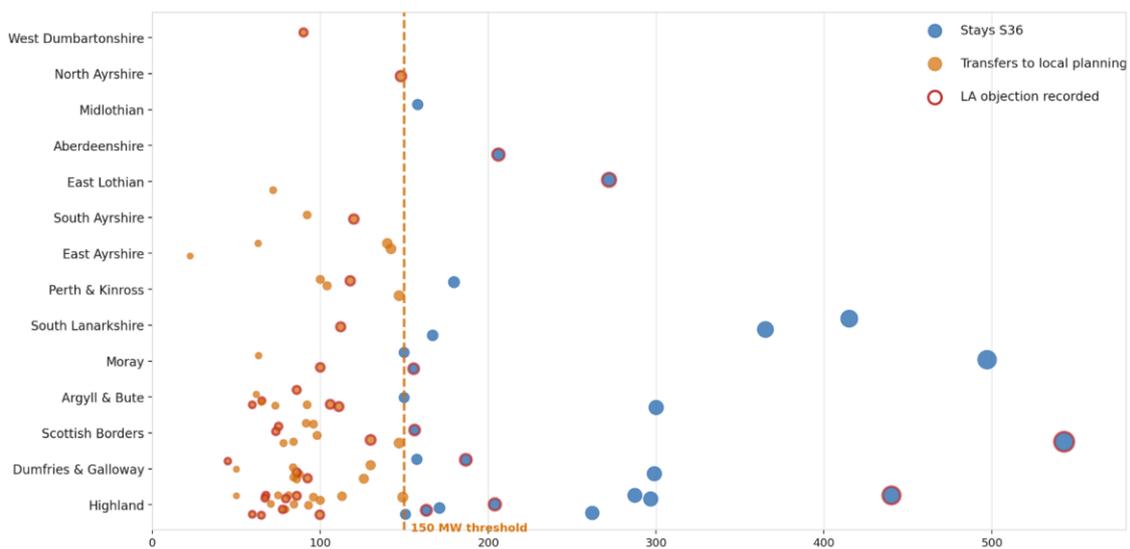
Reallocating the dataset under hypothetical national thresholds of 100 MW and 150 MW produces a marked shift in the distribution of schemes between the national and local consenting routes. Under the existing 50 MW threshold, all 88 undetermined applications in the sample (those currently at consultation, consideration, DPEA referral or determination stage) remain within the Section 36 regime. As exhibited in the associated table, when reclassified using a 100 MW threshold, exactly half of these schemes (44) would fall to local determination, and under a 150 MW threshold, the proportion reallocated to local authorities rises further to 63 schemes.

<b>Determiner</b>	<b>50MW</b>	<b>100MW</b>	<b>150MW</b>
<b>Energy Consents Unit</b>	88	44	25
<b>Local Authority</b>	0	44	63

As shown in Figure 3, the distribution of these reallocated schemes is highly uneven. A small number of local authorities, those already hosting multiple Section 36 applications in the dataset, would receive the large majority of applications newly captured under both the 100 MW and 150 MW scenarios. By contrast, many authorities would receive no additional cases under either threshold. This asymmetry reflects the underlying structure of the dataset, in which projects above and below the alternative threshold bands are not uniformly distributed geographically.



44 CASES TRANSFER TO LA (3.35 GW), 44 CASES REMAIN SECTION 36 (8.67GW)



63 CASES TRANSFER TO LA (5.6 GW), 25 CASES REMAIN SECTION 36 (6.33GW)

Figure 3: Number of active Section 36 schemes that would transfer from ECU to local authority determination under hypothetical 100 MW and 150 MW national thresholds, by host authority (n = 88 active cases, March 2026).

The scenario modelling therefore illustrates that raising the national threshold would significantly alter the allocation of existing large-scale schemes between consenting routes with a disproportional reallocation of applications.

## Regression Analysis of Delay

The regression analysis carried out did not identify any statistically significant predictors of delay.

The coefficient on authority caseload was positive, suggesting a tendency for authorities handling a higher number of large schemes to take longer to provide

an initial response, but the effect size was modest and failed to meet conventional thresholds for statistical significance.

Neither of the upper capacity bands exhibited a significant association with response time, indicating that within the scope of the dataset, larger sites were not systematically slower to elicit a first response. The simplified landscape designation variable similarly showed no significant effect, with confidence intervals encompassing both positive and negative influences.

Finally, contrary to a common assumption that contentious applications generate slower responses, the presence of a formal local authority objection did not predict additional delay. Authorities that lodged a formal objection recorded a median response time of 327 days, compared with 342 days for those that did not, a difference that is not statistically significant. This finding is consistent with a capacity rather than complexity explanation: authorities respond at broadly similar speeds regardless of whether they support or oppose an application, suggesting the delay bottleneck lies in resourcing rather than the contested nature of individual schemes.

Taken together, these results suggest that delays in initial consultation response cannot be readily explained by the observable characteristics of individual schemes. The absence of statistically significant coefficients should not be interpreted as evidence that such factors are irrelevant in practice. Rather, it indicates that within the sample available, variation in response times is more plausibly understood as a function of wider systemic pressures, such as competing workloads, resource constraints, and the cumulative complexity of overlapping energy and grid programmes, than of the discrete features of any given application. The regression findings therefore reinforce the descriptive conclusion that delays stem principally from structural capacity issues rather than from scheme specific attributes.

**Table 1: Local authority response times and threshold reallocation**

<b>Host authority</b>	<b>Total schemes</b>	<b>Active cases</b>	<b>Median resp. (days)</b>	<b>P75 resp. (days)</b>	<b>Transfer at 100 MW</b>	<b>Transfer at 150 MW</b>
<b>Dumfries &amp; Galloway</b>	22	13	608	698	8	<b>10</b>
<b>Scottish Borders</b>	12	11	529	838	7	<b>9</b>
<b>Highland</b>	46	28	361	519	16	<b>19</b>

<b>Moray</b>	7	5	342	547	1	<b>2</b>
<b>Argyll &amp; Bute</b>	17	11	304	440	7	<b>9</b>
<b>Aberdeenshire</b>	3	1	297	334	0	<b>0</b>
<b>East Ayrshire</b>	8	4	230	472	2	<b>4</b>
<b>South Ayrshire</b>	6	2	204	380	1	<b>2</b>
<b>South Lanarkshire</b>	6	4	181	206	0	<b>1</b>
<b>Perth &amp; Kinross</b>	5	5	574	574	0	<b>4</b>
<b>East Lothian</b>	2	2	280*	280*	1	<b>1</b>
<b>West Dumbartonshire</b>	1	1	283*	283*	1	<b>1</b>
<b>Shetland</b>	1	0	120*	120*	0	<b>0</b>
<b>Stirling</b>	1	0	119*	119*	0	<b>0</b>
<b>North Ayrshire</b>	<b>1</b>	<b>1</b>	<b>118*</b>	<b>118*</b>	<b>0</b>	<b>1</b>

Table 1 note: Post-NPF4 Section 36 onshore wind and collocated schemes, February 2023 to March 2026 (n = 140). Median and P75 response figures cover cases with complete response data; asterisked figures (\*) rest on a single observation and should be treated with caution. Active cases are those at consultation, consideration, DPEA referral or determination stage. Transfer columns show active cases moving to local determination under hypothetical thresholds.

## Discussion

The results presented above depict a consenting system marked by extended and heterogeneous consultation timelines, underpinned by a pronounced spatial concentration of large onshore energy proposals. The descriptive evidence demonstrates that delays in issuing first consultation responses are not restricted to a small subset of anomalous cases but are widespread across the dataset, with a median response time of 334 days and a substantial upper tail extending significantly beyond that point, with the upper quartile reaching 578 days (approximately nineteen months). This temporal pattern suggests that the consenting process for large-scale renewable schemes operates under sustained and systemic pressure rather than experiencing intermittent periods of congestion.

The geographical variation observed across authorities provides further insight into the structural nature of these pressures. Authorities hosting multiple Section 36 applications simultaneously exhibit some of the slowest response times, while authorities handling only one or two schemes show comparatively shorter and more variable timelines. Although the regression analysis does not yield a statistically significant caseload effect, the descriptive patterns nonetheless

indicate that exposure to a higher volume of large energy proposals coincides with lengthier consultation intervals. Importantly, this concentration of workload is not an artefact of the analytical method but reflects the underlying geography of onshore wind development and associated grid infrastructure demands.

The scenario modelling further illustrates the structural nature of these pressures. Reallocating schemes under hypothetical 100 MW and 150 MW thresholds produce a substantial rebalancing of cases between the national and local consenting routes, yet the distribution of reallocated schemes remains highly skewed. Authorities already responsible for the greatest number of in scope schemes receive most additional cases under both scenarios, while many other authorities would experience no change at all. These findings indicate that altering the national threshold would not materially diversify the distribution of largescale energy proposals across Scotland's planning authorities; instead, it would amplify existing disparities in exposure to major infrastructure schemes.

The regression findings add an important explanatory dimension. The absence of statistically significant associations between consultation delay and scheme specific characteristics—including capacity band, landscape designation and the presence of an objection—suggests that delays are not readily attributable to the inherent attributes of individual applications. While the confidence intervals around these estimates reflect the limitations of the sample size, the overall pattern of no significance aligns closely with the descriptive evidence, which points towards structural rather than project level explanations for delay. In analytical terms, the high residual variance in the model indicates that factors operating above the individual scheme level, such as internal workflow capacity, resource constraints, or the cumulative effects of overlapping energy and grid projects, are likely to be more consequential drivers of the observed consultation timelines.

Taken together, the descriptive statistics, threshold scenarios and regression results present a coherent empirical narrative. The consenting process for large onshore energy infrastructure in Scotland appears to be shaped less by the characteristics of individual schemes and more by the broader institutional and spatial context within which those schemes are assessed. The identification of persistent, large magnitude delays, combined with their concentration in authorities handling multiple major proposals, underscores the importance of understanding system level capacity pressures when assessing potential reforms to the national determination threshold. While the Results section cannot, by design, draw normative conclusions, the empirical patterns observed provide a

foundation for subsequent policy analysis and highlight the need for careful attention to the structural distribution of planning workload across Scotland.

## Conclusion

This study has assembled and analysed an updated, post NPF4 dataset of 140 Section 36 onshore wind and collocated schemes to examine consultation response times, authority level variation and the redistribution of cases under alternative thresholds. By combining descriptive statistics, threshold reclassification scenarios and a regression model, it provides an integrated empirical account of how large-scale proposals progress through Scotland's consenting system.

The findings indicate three consistent patterns. First, consultation response times are prolonged, with substantial dispersion and a long right tail. Second, exposure to large-scale schemes is geographically concentrated, with a small number of authorities accounting for most of the workload. Third, raising the determination threshold would reallocate a significant share of cases to local authorities, but in a manner that reinforces rather than redistributes existing disparities. The lack of statistically significant project-level predictors of delay strengthens the conclusion that consultation timelines are shaped primarily by system-level rather than scheme-specific factors.

These conclusions must be read alongside the study's limitations. The analysis is cross-sectional and confined to schemes at or above the Section 36 threshold; the primary timeliness metric, days to first substantive response, is a conservative indicator that nonetheless aggregates applicant side iteration and consultee dependencies; and sample size constrains statistical power, particularly for detecting small effects and for richer authority level controls. Together, these caveats argue for cautious inference and for extension rather than revision of the core results.

Notwithstanding these limitations, the weight of evidence points to a consistent implication for policy design: changing the Section 36 threshold is unlikely to improve timeliness. The scenario modelling indicates that threshold uplift would primarily reroute cases rather than rebalance workload, with additional determinations accruing to the same small set of authorities that already experience the longest consultation intervals. In this context, the more credible route to improved performance is to address capacity first, through targeted resourcing, shared technical services and procedural refinements within the

existing national regime, before contemplating structural alterations to the threshold. As reforms under the Planning and Infrastructure Act bed in, the dataset and methods presented here offer a replicable means to track whether capacity interventions, rather than threshold changes, deliver the intended gains in pace, predictability, and transparency.

# The Impact of Planning Delays

Challenges and Opportunities

March 2026





# Executive Summary

Current planning timescales for onshore renewable developments are not conducive to meeting 2030 ambitions, with delays in the consenting process causing:

- **sustained reliance on carbon-intensive fuels - with benefits lost from generating electricity earlier and loss of community benefit funds;**
- **higher energy pricing for customers, through increased CfD prices;**
- **an additional 10% of development costs per year of delay;**
  - With 9.2 GW of onshore wind capacity currently within the Scottish planning system, a delay of just one year to each project will cost consumers £36.8 million on additional interest payments alone.
- **anxiety and stress within communities, and erosion of trust between key stakeholders;**
- **heightened opposition to onshore developments; and**
- **loss of investor confidence in Scotland.**



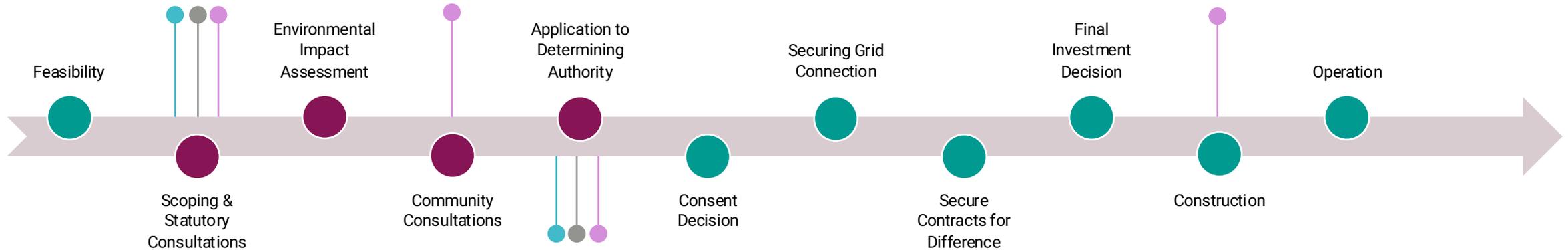
Efficient and effective planning systems are essential to realising the economic opportunity of Scotland's transition to net-zero.

Building capacity and skills in the planning service; collaboration and communication throughout the consenting process; and providing clarity and certainty for developers will help realise this.

BiGGAR Economics is grateful to everyone who contributed to this research, without whose assistance this report could not have been produced.



# The Butterfly Effect: A Scenario Analysis



## Scenario 1: 1 Year Delay

The simplest way to consider the impacts, is to consider a scenario in which a one-year delay in the planning system only adds one year to the developer's time scales.

For a 100 MW project, this one-year delay is estimated to cost consumers an additional **£400,000** in additional interest payments.

## Scenario 2: CfD Impacts

If a developer fails to secure grid connection, they are consequently ineligible for the next CfD applicant window, and higher construction inflation will cost consumers more in the long run.

For a 100 MW project, this impact has the potential to add **£10 million** to consumer bills over its lifetime.

## Scenario 3: Risk to Viability

In extreme cases, delays in the planning process that result in missed grid connection and CfD application windows can result in projects being no longer financially viable, and the loss of the associated economic activity.

The lost economic contribution of a 100 MW project is estimated to be approximately **£200 million** over the project's lifetime.



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- **Onshore Wind Sector in Context**
- **Planning Process**
- **Current Challenges**
- **The Opportunity**
- **Sources**





# Value of Planning

Planning plays a key role in the transition to net-zero by shaping markets and encouraging collaboration between developers, communities, and public bodies.





# The Value of Planning

Good planning can help markets to work better.

- Often dismissed as a barrier to economic progress, *good* planning is more than a regulatory process. Good planning can make markets work better.
- **Shaping markets:**
  - providing clarity and certainty to landowners, developers and communities; and
  - reducing risks and fostering investor confidence.
- **Enabling collective action:**
  - encouraging collaboration between developers, communities and public bodies; and
  - identifying opportunities to enhance benefits.

***“Planning is about improving places by helping them to function better economically as well as socially and environmentally. It is about outcomes, not just processes [and] is not always done by people called ‘planners’.”***

**Adams and Watkins (2014)**



# The Value of Planning

A thriving renewables sector is critical to achieving sustainable development in Scotland, the defining objective of the planning system.

- The purpose of Scotland’s planning system is to:

***“...manage the development and use of land in the long-term public interest... [defined as] ... anything that contributes to sustainable development or achieves the national outcomes.”***

**Planning (Scotland) Act 2019**

- A “globally competitive, entrepreneurial, inclusive and sustainable economy” is one of Scotland’s 11 national outcomes.
- The transition to net-zero is fundamental to sustainable development and has been consistently recognised by the Scottish Government as Scotland’s most important economic opportunity.
- Renewables are:
  - at the forefront of Scotland’s National Strategy for Economic Transformation (2022)
  - the driving force of the *revolution* envisaged in Scotland’s Green Industrial Strategy (2024)



# Onshore Wind Sector in Context

As a cornerstone of Scotland's net-zero strategy, the planning process can enable the sustainable development of onshore wind.

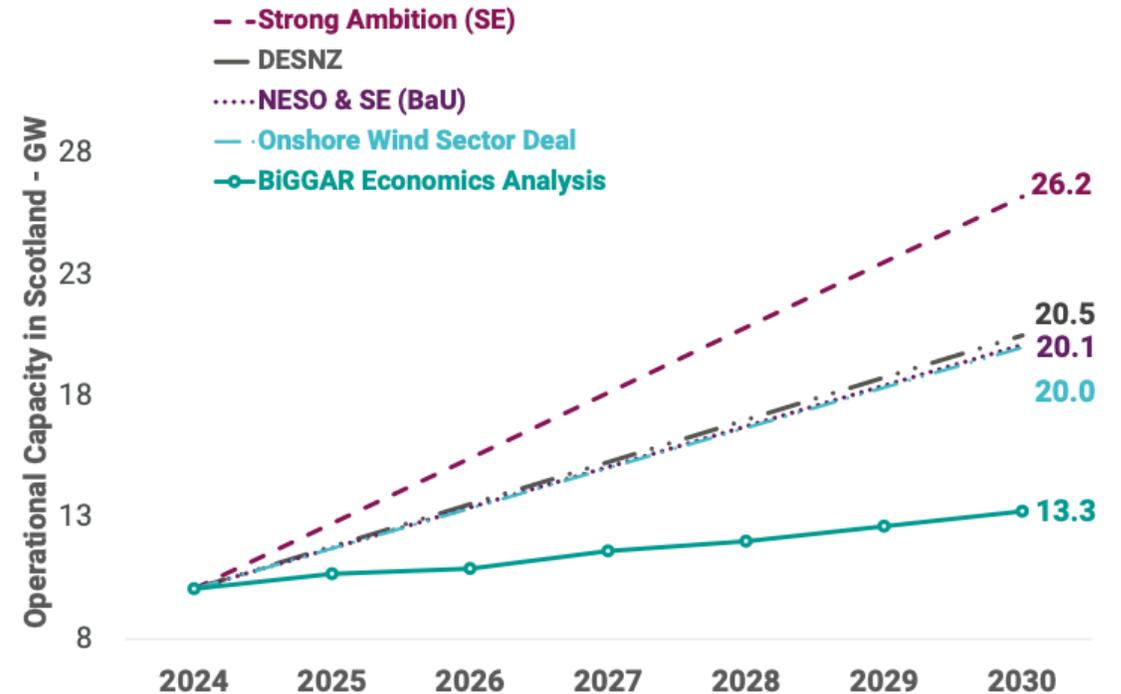




# The Onshore Wind Sector in Context

Based on an analysis of the Energy Pulse database, Scotland could miss out on the onshore wind targets of 20 GW for 2030 by 6.7 GW.

- However, once accounting for project timescales and progression rates, our analysis expects that by 2030 onshore wind operational capacity will reach:
  - 13.3 GW in Scotland.
- This would fall short of the 2030 targets by 6.7 GW for Scotland. Starting from current operational capacity, achieving sectoral targets is likely to require:
  - accelerated project timescales;
  - increased approval rates; and
  - additional projects in the pipeline.
- This analysis does not account for potential market changes such as zonal pricing, regulatory reforms or Transmission Network Use of System charges.



BiGGAR Economics Analysis of RenewableUK (2025), EnergyPulse Database.



# Planning Process

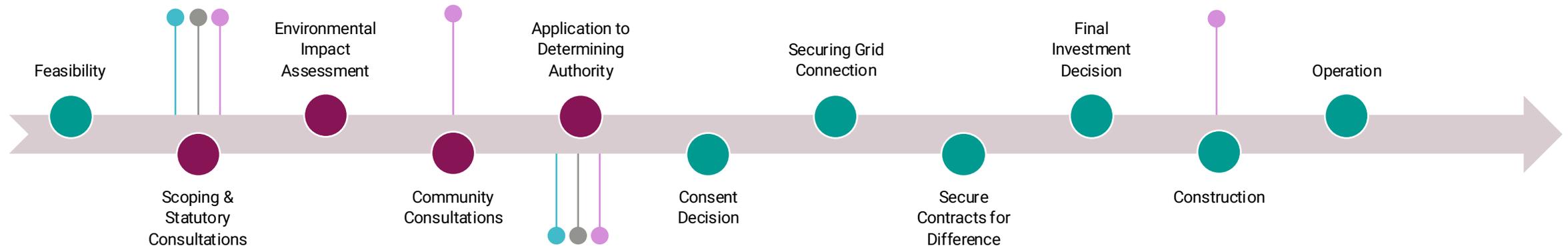
**National Energy System Operator (NESO) requires developers to secure both planning and a Gate 2 Grid Application, before being eligible to apply for the next Contracts for Difference (CfD) Allocation Round.**





# The Planning Process for Renewable Energy Consent

Sequence of the planning process for renewable energy development consent is outlined below. Consultation takes place throughout a process that can take over 10 years from feasibility to construction.



## Milestone

-  Project Hurdle Milestone
-  Consenting Milestone

## Consultation Inputs

-  Statutory Consultees
-  Planning Authority
-  Community



## Current Challenges

Consultations with key stakeholders revealed key challenges within the planning process that have implications for developers, communities, and Scottish Government priorities.





# Perspective from Planning Authorities

To meet net-zero targets, ECU internal processes must align with external milestones, including Grid Connection and CfD application windows.

## Rushed Decisions

Under-resourcing and difficulties recruiting planners has led to heightened pressures on those working on renewable developments.

This has led to significant delays in planning application decisions, a 'tick box' culture resulting in rushed decisions, reduced confidence, and the rejection of applications on the grounds of a lack of resources to support approval.

## 'Them and Us' Culture

Whilst developers recognise the heightened pressure on planning authorities; criticisms around a lack of consistency across consenting decisions, limited communication and transparency around decision-making and timescales were highlighted as significant challenges for developers.

The 'them and us' culture created by these factors has led to a lack of collaboration between stakeholders.

## Internal Policy Reform

Current misalignment between the ECU internal process and external timescales, including grid connection and CfD application windows creates a bottleneck for onshore renewable planning applications and significant delays for developers.

ECU internal processes must be reformed to consider external timescales to enable collective action and to meet net-zero ambitions.



# Implications for Scottish Government Ambitions

Challenges around the planning process for renewable energy developments has significant implications for the Scottish Government's economic growth ambitions.

## The Value of Onshore Wind

- **An onshore wind farm generates significant value for Scottish businesses, the Scottish and UK Government, and local communities.**
  - The businesses who prepare the site, design the project, and manufacture and install turbines all generate economic value and support the provision of high-quality jobs across Scotland.
  - Based on BiGGAR Economics (2024) analysis of an onshore wind farm's Operating Surplus (the income from an onshore wind farm less what it spends on supplies and staff costs), approximately 59% will go to taxes, including corporation tax, business rates and the electricity generator levy, contributing to Government spending.
  - Approximately 10% will be allocated to Community Benefit Funding, creating long-lasting benefits for communities.

## Economic Growth Ambitions

- **The Scottish Governments National Strategy for Economic Transformation (2022) sets out its commitment to building a fairer, greener, and more prosperous Scotland.**
  - Onshore wind and the wider energy provides a unique opportunity for Scotland to generate a significant level of investment and economic activity, helping to foster long-term sustainable economic growth.



# Developer Perspective

The current planning system poses significant challenges for developers, with the following key pain points identified through consultation with industry.

## Process Misalignment

The requirement for developers to secure planning and grid before being eligible to apply for the next CfD Allocation Round creates time pressure within the planning process. Annual application windows for CfD mean that if developers are not able to secure planning and grid connection before this window, they will have to wait up to a year to apply again.

## Statutory Consultees

Extension requests from statutory consultees were highlighted as a common source of delay. Requests for additional surveys and photos, often requiring particular conditions, elongate timescales significantly. Consultation with industry also revealed that the average local authority consultation response time was 360 days, with Dumfries and Galloway, and the Scottish Borders exceeding 600 days.

## Planning Authority

A lack of communication and transparency during the ECU review period was also highlighted as a key challenge for developers. Developers highlighted inconsistencies between projects, making it particularly difficult to predict timescales and decisions. These uncertainties mean developers are unable to communicate key delivery dates to investors, local communities, and contractors.



# Financial Costs to Developers

Current planning timeframes are approaching 3 – 3.5 years, instead of the industry standard estimate of 2 years. This is generating significant additional costs for developers.

## Direct Holding Costs

- Keeping projects alive during periods of delays requires developers to continue expenditure on staff and other resources.
- **Additional Surveys and Technical Inputs**
  - Adhoc costs associated with additional surveys and evidence.
- **Costs in pursuit of Multiple Strategies**
  - Inconsistencies around timescales and decisions require developers to pursue multiple strategies which is resource intensive and costly.
- **Opportunity Cost**
  - The lost profit associated with not generating electricity earlier.

- **Land Agreements**

- Expiring land agreements can be costly to re-negotiate.

- **Requirement for Re-development of Projects**

- Delays in the consenting process can result in technology becoming obsolete, requiring additional costs and resources to re-develop projects to incorporate the latest technology and industry standards.



**Resulting in an additional 10% of development costs per year of delay.**



# Financial Costs to Developers

The cost of delays adds to consumer bills. The most universal cost associated with developers is the cost of holding the debt finance used for development for an extra year.

## Direct Holding Costs

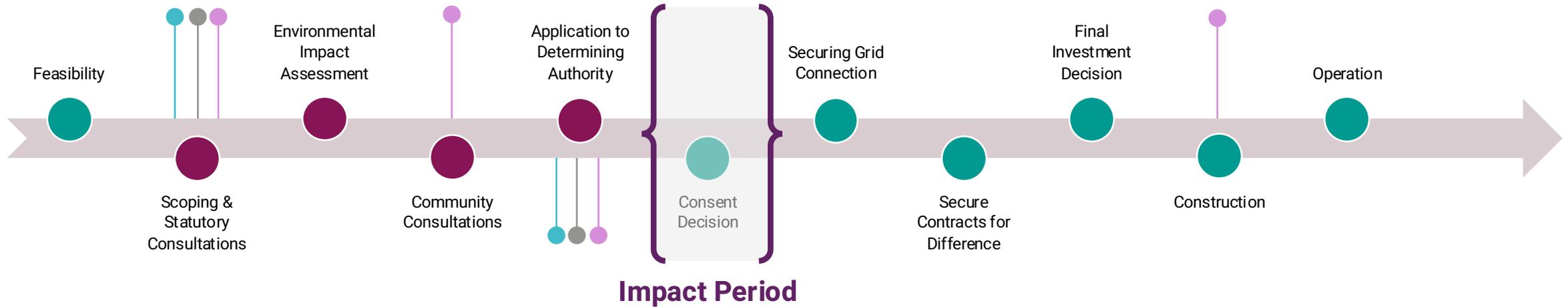
- The average development cost per MW for onshore wind in Scotland is approximately £40,000.
- A delay of one year would require a developer to hold that debt for one more year and pay the interest on the finance used to pay for the development.
- Typically, the cost of capital (either through loan finance or opportunity cost) is around 10% per year.
- Therefore, the cost per year for every MW of onshore wind which is delayed as a result of planning is £4,000. This will get added to consumer bills as costs are recovered in CfD bids.
- With 9.2 GW of onshore wind capacity currently within the Scottish planning system, a delay of just one year to each project will cost consumers **£36.8 million** on additional interest payments alone.



However, costs can be much greater than this, as explored in the following scenarios.



# Financial Costs to Developers: Scenario Analysis



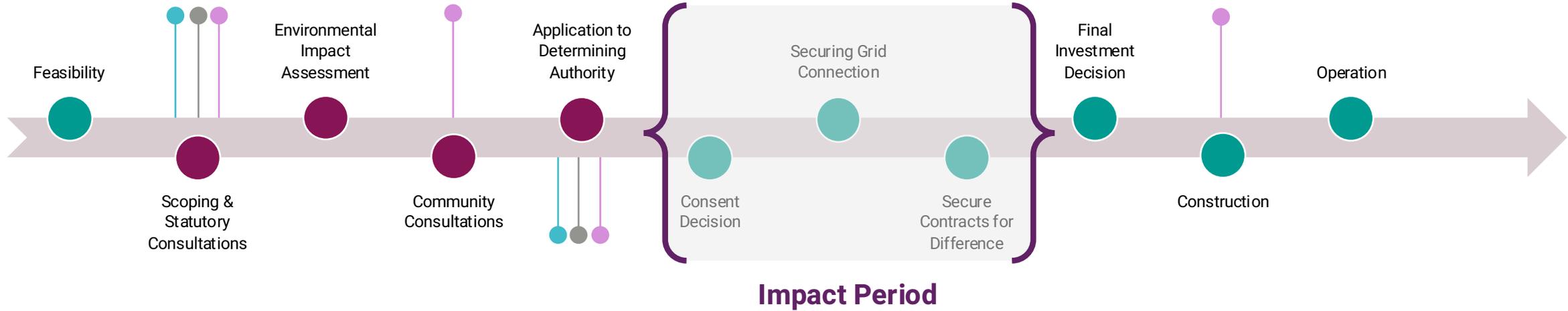
## Scenario 1: 1 Year Delay

The simplest way to consider the impacts, is to consider a scenario in which a one-year delay in the planning system only adds one year to the developer's time scales. This assumes that the developer is still able to secure the grid connection they were planning on and are successful in the next allocation round of Contracts for Difference, which clears at the same price as the previous year.

For a 100 MW project, this one-year delay is estimated to cost consumers an additional **£400,000** in additional interest payments.



# Financial Costs to Developers: Scenario Analysis



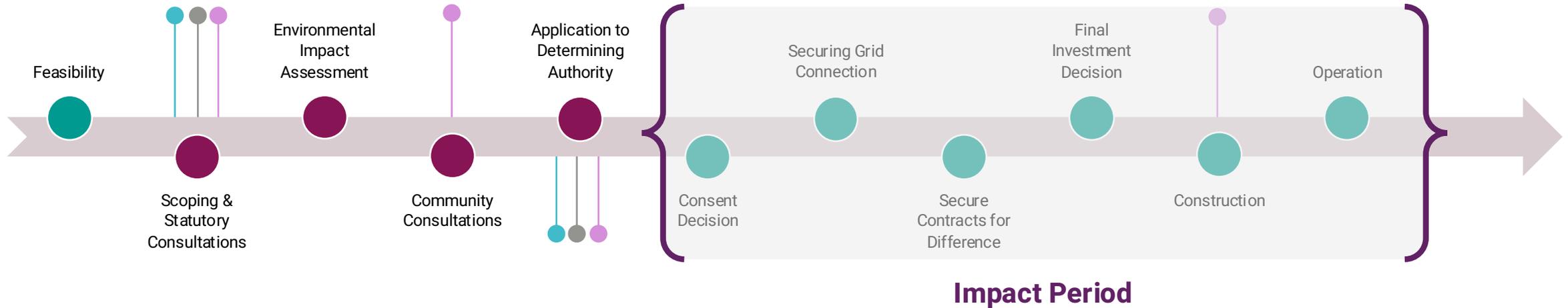
## Scenario 2: 1 Year Delay and CfD Cost implications

However, it is unlikely that the cost implications would be confined to just interest payments. Onshore wind projects need planning permission before they can bid for CfD. The **cost of construction for onshore wind projects has increased** at a faster rate than general inflation in recent years. If an onshore wind farm needs to delay which round it bids for this costs the consumers in the long run. For example, in AR7a in 2026 had a strike price of £72.24/MWh, compared to £70.92/MWh for AR6. Therefore, consumers will pay **£1.32 more per MWh** for any project that had to wait for AR7a

For a 100 MW project, the CfD increase is estimated to cost consumers an additional **£10 million** over the lifetime.



# Financial Costs to Developers: Scenario Analysis



## Scenario 3: Year Delay and Project Viability

Information from recent consultations with industry indicate that at least one project failed to secure CfD by 48 hours, necessitating a 12-month wait for the subsequent application window. There can be no guarantees that projects will be able to secure the grid connection, or the finance, if these are delayed. Planning delays have also caused projects to become unviable as the technology moves on. If a project does not go ahead, all of the economic benefits associated with its construction and operation are lost.

The lost economic contribution of a 100 MW project is estimated to be approximately **£200 million** over the project's lifetime. This includes **£15 million of lost community benefits funding** and **£36 million of lost business rates**.



# Community Perspective

Over 60% of community members were disappointed or very disappointed with the planning service; with 57.6% rating the time taken to respond to queries as poor or very poor\*.

## Uncertainty Around Decisions

Without clear timelines, communities feel stressed when there is a lack of clarity around when (or if) a development will be built.

Uncertainty is worsened when adjacent projects are proposed whilst others are yet to be decided.

A key criticism from communities is the lack of communication and transparency around changes and delays in the consenting process, and the reason for these.

## Erosion of Trust

These experiences have created a lack of trust between communities, the planning authority, and developers.

Many communities no longer trust that they will be updated on design changes or the submission of new information in the consenting process.

Prolonged periods of inactivity from planning delays can also undermine once positive relationships between developers and communities.

## Lack of Meaningful Engagement

Communities often feel that community consultation is not true engagement, but merely the provision of information.

During this process, residents become frustrated when they are unable to see how their feedback has been used or understand why it was disregarded. This frustration can lead to heightened opposition towards the renewables industry as a whole.

*\*Improvement Service (2025), National Planning Improvement Customer and Stakeholder Survey Results.*



# Costs to Communities

Whilst there is generally high national support for renewable energy, uncertainty during the planning process has created heightened opposition to local developments.

## Social Fragmentation

- **Delays within the planning process create an opportunity for opponents of projects to come together and push out the quieter voices within a community.**
  - The divergence of attitudes within communities can create rifts between residents who support renewables and those who don't.

## Consultation Fatigue

- **Given the scale of onshore wind required to meet 2030 targets, communities often feel overwhelmed by the volume of consultations.**
  - This creates fatigue within communities and reduces the likelihood of meaningful engagement between developers and communities.

## Community Benefit Opportunity Cost

- **Similar to the 'opportunity cost' associated with not generating electricity earlier, communities face an opportunity cost of not receiving community benefits earlier**





# Wider Costs to Society

The costs to developers and communities can jeopardise a project's route to market adding wider costs to society in general.

- **Opportunity Cost**

- The biggest cost is the 'opportunity cost' of not generating electricity earlier which equates to £millions in generation, loss of community benefit funds, and sustained reliance on carbon-intensive fuels.

- **Higher CfD Pricing for Customers**

- Risk premiums from sliding timescales and higher financing costs associated with uncertainties can risk a project's viability. Ultimately, a less financially competitive project may progress through the planning system and lead to higher CfD pricing for customers.

- **Heightened Opposition to Renewables**

- Uncertainty can create challenges for developers in communicating with communities and contractors, which can lead to heightened local opposition.

- **Erosion of Investor Confidence**

- Delays in the planning system can be perceived by investors as risky, making both individual projects and Scotland as a location less investable.
- This may lead to activity moving elsewhere, benefitting other countries rather than Scotland.



## The Opportunity

*Good* planning creates a unique opportunity for Scotland to shape the renewables industry, realise its associated economic activity, and improve societal perceptions.

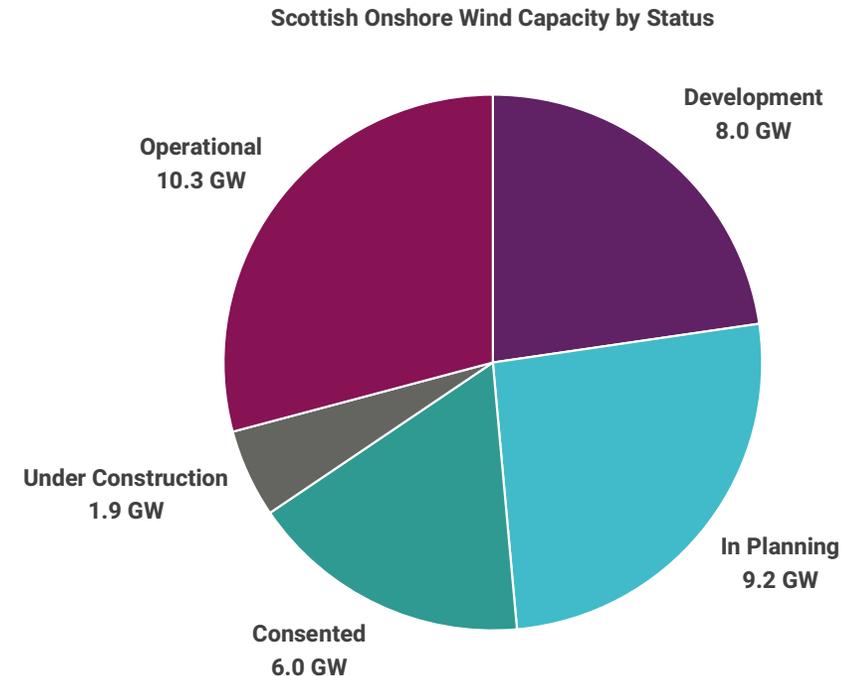




# The Opportunity: Economic Activity

The economic opportunity for Scotland is huge provided projects are consented.

- **Good planning can enable a dramatically more stable, predictable, and investable pipeline.**
  - These conditions are crucial for enabling the transition to net-zero and fostering long-term sustainable economic growth across Scotland.
- **With 9.2 GW of onshore wind capacity currently within the Scottish planning system, there is a significant opportunity for Scotland to capitalise on the opportunities associated with the energy transition.**
  - The lifetime economic contribution of the projects currently within planning could equate to **£18.4 billion GVA** (inclusive of community benefit funding and business rates).
  - This economic activity has the potential to be transformational for communities and supply chains across Scotland.



*RenewableUK (2026), EnergyPulse Database.*



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# BiGGAR Economics

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