

Economy and Fair Work Committee
The Scottish Parliament
Edinburgh EH99 1SP

18th December 2023

Dear Members of Economy and Fair Work Committee,

Just Transition for the North East and Moray – Planning and Consenting

Thank you for the opportunity to provide evidence on 15th November 2023 as part of your inquiry on a Just Transition for the North East and Moray. As was requested at that session, I am writing to share SSE's views on the steps that should be taken with regards to planning and consenting in Scotland to accelerate the just transition to net zero.

Planning and consenting remains a key risk to Scotland's green leadership ambitions and the delivery of a decarbonised electricity system across Great Britain. At present, the planning system badly lacks the resource it needs to facilitate net zero. The decision-making process for project consenting also needs to be streamlined to reduce delays and de-risk investment in critical infrastructure. Currently, the average offshore wind farm takes around 12 years to deliver and major network infrastructure can take even longer (the Beaulieu-Denny network upgrade took 14 years due to Public Local Inquiry). The Scottish Government should use powers at its disposal to create competitive advantage, attracting investment to Scotland by making it the fastest place in GB/Europe to develop critical low-carbon projects.

We welcome the ambition outlined in the Programme for Government 2023/24 to further streamline offshore wind consenting processes, ensuring the most efficient management of both pre-application and post-consent processes and shortening timeframes where possible. In addition, we welcome the agreement reached with industry in the Scottish Onshore Wind Sector Deal to work towards halving the average determination time for section 36 applications to 12 months where there is no public inquiry and two years with an inquiry.

Such an approach must also be replicated across other technologies – in particular electricity networks. SSEN Transmission welcomed collaboration with the Scottish Government and Scottish Power Energy Networks as part of a Short Life Working Group to explore options for planning and consenting acceleration in relation to the grid. The Working Group's recommendations, accepted by the Energy Minister, should be implemented with urgency.

Collectively, these commitments would, if implemented, deliver a clear and welcome signal that Scotland is open to low-carbon investment. Action is also required by the UK Government, as legislation underpinning the existing regime for overhead lines, by way of the Electricity Act 1989, is reserved (see point 2c below).

As a key enabler of the Scottish and UK Government's 2030 renewable energy targets, nothing is more important to the delivery of Scotland's economic ambitions than the development of the electricity network. Analysis by [BiGGAR Economics](#) showed SSEN Transmission's Pathway to 2030 buildout alone will unlock 9,000 Scottish jobs.

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1. Resourcing

Achieving this ambition, however, will only be possible if our planning and consenting systems, and government agencies and directorates, are properly resourced to handle the scale and complexity of energy applications required to meet net zero.

This is felt acutely in our local authorities where Scottish Renewables research found that the number of planning department staff employed fell by 20% between 2011-2020, from 1,515 in 2011 to 1,216 in 2020.

We recognise that resourcing continues to be a major challenge for planning authorities which is having a significant bearing on the level of service they are able to provide. The underlying issue appears to be a lack of finance to sustain staff numbers at a level which enables retention, positive well-being and ensures workloads are kept to a manageable level. The result is bottlenecks, which are only set to be further exacerbated by rapidly growing volumes of new applications, as well as repowering.

We had hoped the significant increase in planning fees which came into effect on 1st April 2022 would have provided planning authorities with the increased financial capability to sustain and increase planning staff levels. However, it is understood planning application fee income is not ringfenced at local government level and is therefore delivering no net benefit to the level of service – even though it was intended to be by the Scottish Government.

To address these challenges, the Scottish Government should:

- a) Deliver **ringfenced funding to all local authorities** to build additional capacity and capabilities for processing the growing volume of energy applications in the full spirit of the National Planning Framework 4.
- b) Specific consideration should be given to the creation of a **centralised floating resource of planners** with expertise in energy projects and specialist areas such as ornithology, marine biology and peatland, deployed to alleviate local bottlenecks.
- c) This should be complemented by an **urgent drive to train and recruit more planners** as well as encouraging cooperation between local authorities to share expertise and resource.
 - o As of 2023, there is currently only one undergraduate RTPI accredited Town Planning degree taught in Scotland, which is at Dundee University.
 - o Government must work with other HE/FE institutions to encourage the teaching of Planning and Environmental-related undergraduate degree courses to unlock a future pipeline of planners. It is understood that Heriot Watt University and Aberdeen University both previously delivered RTPI accredited courses.

Recognising the challenging economic outlook, we are keen, with our partners in industry, to support the Scottish Government and regional decision makers in finding both short and long-term solutions to ease the burden on planning teams from a cost, well-being and skills perspective. Collaboration and partnership with business and skills organisations, across all relevant industries, will also be important to identify skills gaps and encourage more young people to enter careers in planning as a critical component of our national mission to establish Scotland as a world leader in low-carbon energy.

2. Other key steps

- a) **Ancient woodland:** The current wording of NPF4 (Policy 6) will prevent any development going ahead that results in the loss of – or adverse impact on – ancient woodland, even where mitigations exist. Due to the linear nature of transmission projects it is not always possible to avoid every parcel of ancient woodland while fully adhering to other, often competing, statutory protections. This wording could inadvertently lead to significant delays to critical networks projects.
- b) **Strategic environmental compensation:** Overcoming the environmental barriers to consenting will also be key to accelerating deployment of offshore wind. In particular, it is important that a package of strategic environmental compensation measures to mitigate the impact of offshore wind is urgently agreed and implemented. The current Scottish Government consultation on the closure of sandeel fisheries must conclude that part of environmental benefit of these closures can be used as an appropriate compensation measure for offshore wind farms seeking a derogation from the Habitats Regulations. Failure to do so will restrict major projects in advance of and including ScotWind.
- c) **Automatic PLI trigger:** Action at a UK level is required to amend the automatic Public Inquiry trigger within the UK Electricity Act 1989 on key Scottish networks projects – which risks delaying them for years. This would not preclude PLIs where appropriate but mirror the more proportionate approach taken in England and Wales. This step was one of Nick Winser, the UK's Electricity Networks Commissioner's key recommendations in his 2023 report on accelerating electricity transmission infrastructure. In Autumn, UK Government announced it would implement his recommendations in full. While we await changes to Section 37 at a UK level, the Scottish Government should limit time and scope of PLIs to ensure decisions are still taken within 12 months of submission to avoid delays to consents.

In addition to our written submission from October, I hope this letter is helpful in setting out SSE's views, but please do not hesitate to get in touch should you require any further information.

Yours sincerely,

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