



Aberdeen & Grampian Chamber of Commerce

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

Question 1) Should there be a single threshold applicable to all technologies? Yes | no view | No Please explain your view

AGCC does not have a view on this.

Question 2) What threshold should apply for applications for electricity generation to be determined by planning authorities? a) 50MW b) 100MW c) 150MW

Please add any comment in support of your answer.

In AGCC's view the existing threshold of 50MW strikes an appropriate balance.

While AGCC supports the principles outlined in the Verity House Agreement that decisions should be made as close to communities as possible, we question whether local planning authorities are best placed to be decision-makers on larger energy infrastructure projects of strategic national importance. We would affirm their role as Statutory Consultees for these larger projects.

The risks of increasing the 50MW threshold is that it has the potential to introduce further delay, cost, inconsistency, and uncertainty into the planning process for developers of larger-scale energy projects at a time when there is an urgent and pressing need to streamline and accelerate those processes (see Q6 below). We acknowledge that there are pressures on the ECU in dealing with a significant increase in Section 36 and Section 37 applications, but those bottlenecks in the system are unlikely to be alleviated by transferring the pressures to another part of the system without addressing the underlying issue of resource constraints.

Progressing the energy transition is essential not only to decarbonising our energy system; it is crucial to our future energy security and to reducing energy costs for businesses and consumers in the longer term. Crucially for North-east Scotland, a successful energy transition will be foundational for our future economic prosperity: critical to protecting existing high-value jobs in our world class supply chain and creating new employment opportunities for the next generation.

Yet the energy transition has stalled. Renewable energy projects are not coming to scale nearly quickly enough to meet the UK and Scottish Governments' ambitious policy targets, or to compensate for the sharp decline in jobs related to North Sea oil and gas production across the region (see Q.6 below). While planning consents are only one factor in a complex picture of why the energy transition is not progressing, they are mission critical to bringing renewable energy projects to operation at scale. We need an acceleration in consenting for large-scale energy projects which will require leadership from policy makers at national and local level and commensurate resourcing. We are concerned that asking local planning authorities to determine larger-scale projects, often projects of strategic national importance, risks tipping the balance of consideration in decision-making towards localised concerns rather than the imperatives of growing the economy, strengthening energy security, bringing down energy costs, and decarbonising our energy system.

The scale and pace of change associated with the energy transition is challenging for all stakeholders at local and national level. It places pressures on public sector stakeholders such as local planning authorities, the Energy Consents Unit, and the DPEA, but it also impacts on local residents and businesses in the areas most affected by new infrastructure development. In our region, this is most evident in those parts of Aberdeenshire where new infrastructure will be required to upgrade the electricity transmission network to enable the delivery of offshore wind generation, but it also affects the economic health of the wider region. Without new infrastructure, our region will be unable to consolidate the benefits of offshore wind, and a generational opportunity will have been missed.

There is evidence of strong local support for the development of renewable energy. For example, recent polling conducted by the Diffley Partnership in those (mainly rural) local authority areas most directly impacted by the development of new energy infrastructure, published earlier this year, showed that a substantial majority of local residents support these developments or maintain a neutral stance towards them (see Q.6 below). Local planning processes, however, rarely reflect these positive local attitudes towards projects associated with the energy transition as there is little motivation for those who support proposals to participate in the process. This means that objectors' views tend to be amplified in the process at local level, rather than strategic policy imperatives.

In considering a change to the 50MW threshold, the Scottish Government needs to take seriously the possibility that it will further slow the consenting process at a time when policy makers should be looking to accelerate and streamline it. In Aberdeenshire (and other local authorities) we have seen a recent high-profile example of a project of strategic national importance (SSEN's 'Hurlie' substation) refused by the local planning authority despite being in line with UK and Scottish Government policies and recommended for approval by professional planning officers. We have seen this pattern replicated in other local planning authorities. Such projects are likely to go to appeal and/ or public inquiry, delaying essential upgrades to the electricity grid, creating uncertainty for prospective grid users, and ultimately eroding investor confidence. Protracted and unnecessary delays add needless cost to projects; however, a pattern of such refusals contributes to a climate hostile to investors and developers, compounding other factors that add to the risk-profile of individual projects as they move towards FID.

A point that tends to be overlooked is that when crucial energy projects that comply with policy are refused consent by local planning authorities, it is not only developers who pick up the tab; we all pay the price of these delays. There are very significant opportunity costs for the wider economy -- for local jobs and supply chains, for the public finances, and ultimately, in the longer-term, for consumers and businesses who continue to pay inflated costs for energy.

A consistent, predictable system of consents and application of planning policy is crucial to business confidence, and in our view, the ECU is better placed to assess larger projects in a professional, consistent, dispassionate way than local councillors, who are more susceptible to external pressures, including orchestrated protests.

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

We have no comments to make on transitional arrangements.

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

The consultation raises wider issues about how businesses engage with planning processes in a context of orchestrated protest. In recent times, energy infrastructure projects have increasingly become a magnet for organised protest, the objective of which appears to be to derail the energy transition by deterring investment.

In North-east Scotland, we have relatively recent memories of how an economically and socially transformative major infrastructure project was subjected to protracted delays in the example of the Aberdeen Western Peripheral Route. This cautionary tale reminds us of how a small number of well-organised objectors with deep pockets were able to exploit the planning system to hold up construction for years at considerable public expense and to the detriment of the local economy and inconvenience of residents. We cannot afford to see history repeat itself in relation to the energy transition.

The Scottish Government needs to consider emerging challenges, such as AI generated objections to energy developments, and how the planning system can evolve to take a 'whole system' approach to consenting of the electricity network. The current approach has been piecemeal and inconsistent.

Question 5) Do you have any comments on the partial and draft impact assessments undertaken?

The BRIA seems to consider the proposed changes through a bureaucratic lens rather than an economic and social lens. It appears from the consultation documents that resource allocations are a major driver for the proposed change to thresholds, both in terms of local authorities being able to better manage and/or recoup the costs associated with responding to Section 36 and Section 37 applications as a Statutory Consultee, and in terms of managing increased workloads and potential backlogs at the Energy Consents Unit. In our view, these issues should not be driving policy change on thresholds but should be addressed on their own merits. If an unintended consequence of changing the current 50MW threshold is an increase in the refusal of applications by local planning authorities, that is likely to lead to greater costs overall, not only for applicants/developers, but for the public sector as a whole when proposals go to appeal or public inquiry.

We question whether it is sensible to shift system pressures caused by the increased number of larger-scale applications associated with the energy transition onto local planning authorities without addressing the underlying resource constraints. There is no virtue in simply shifting the bottleneck. The workloads of councillors and planning officials are already substantial, especially in those areas most affected by energy transition. Councillors, who provide the essential democratic scrutiny and accountability in the planning process, rarely have professional-level planning expertise. Moreover, consideration of planning matters is only one aspect of their wider remit. Many councillors also combine their roles with other professional commitments, (which is reflected in the relatively modest level of remuneration they receive). It is hard to see how asking councillors to determine applications for developments over 50MW in addition to their existing responsibilities will improve the speed or consistency of decision-making. Indeed, we are

concerned that it could tip the balance towards localised concerns being prioritised over strategic national and economic interests in decision-making.

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?

AGCC's [Energy Transition Survey](#) provides ongoing comprehensive reporting on confidence, investment and transition in the energy sector. Recent reports demonstrate that the energy transition is stalling in North-east Scotland, while our world-class energy supply chain capability is increasingly looking to opportunities overseas.

Professor Paul de Leeuw's [Striking the Balance](#) report (Robert Gordon University, June 2025) sets out the scale and pace of decline in North Sea-related employment, predicting job losses of around 400 jobs every two weeks between 2025 and 2030. The Report highlights the urgent need to accelerate the scale-up of offshore renewables.

[What the North Thinks](#) is a survey of public opinion in those regions of Scotland most affected by new energy infrastructure conducted by the Diffley Partnership for True North Advisors and published in January 2026. It confirms widespread public support for new renewable energy developments and associated infrastructure.