

# Onshore electricity generation: increasing the threshold for applications under The Electricity Act

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From growing start-ups to major electricity generators, grid and infrastructure developers and energy suppliers, our members are driving change across power, heat, transport and flexibility.

We provide a collective voice for the sector working with governments, regulators, charities and other organisations to provide crucial insight that shapes policy, offers solutions and promotes best practice.

Our broad view across the whole system supports evidence-based positions which are not tied to particular technologies, and are focused on delivering strategic benefits for people, businesses and the economy.

We champion initiatives such as our Vulnerability Commitment, which pushes suppliers to go beyond regulation to support customers with additional needs, and TIDE, the industry's drive for greater inclusion and diversity. Through our Young Energy Professionals Forum, we support the development of future leaders.

We are equally committed to our team and are proud to be recognised as a 'Gold' Investors in People employer.

## Executive Summary

Energy UK supports retaining the 50MW threshold for onshore electricity generation projects. This will help enable more consistency in decision making for Scottish projects, and avoid constraints on local planning authorities.

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

Yes. This incentivises a level playing field for projects, and it is appropriate for the technologies that are set out in the consultation document. Separate thresholds for separate technologies are only likely to increase the difficulty and complexities within the planning system, and are not necessary.

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

The current threshold should be retained at 50MW. While recognising that the markets for onshore wind and solar have grown through the years with larger projects coming through the system, the section 36 process still confers significant advantages. These include that the existing system well understood for major schemes, and the Good Practise guidance underpins this system. National determination is more case specific, and this therefore helps more fully enable renewable energy projects.

Retaining the consistency for projects also helps forward investment and renewable pipeline progression. The criterion for changing the threshold is not sufficiently strong enough to justify a large change in the way projects are processed through the system.

While this is non-aligned with the National Planning Policy Framework in England, the Scottish and English markets for onshore wind and solar in particular are in different places, due to both the onshore wind market being mature in Scotland, and lower demand for solar projects.

The capacity of local authorities to engage with the number of potential projects is also a concern. Retaining the 50MW level will have fewer projects going through LPAs, reducing constraints and enabling capacity elsewhere.

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

As above for Question 2, Energy UK supports the 50MW threshold limit being retained as it is.