



Infrastructure Wales Bill

Requirements for pre-application
consultation and methods of
engaging stakeholders and local
communities

July 2024

About us

Since 1978, Solar Energy UK has worked to promote the benefits of solar energy and to make its adoption easy and profitable for domestic and commercial users. A not-for-profit association, we are funded entirely by our membership, which includes installers, manufacturers, distributors, large-scale developers, investors, and law firms.

Our mission is to empower the UK solar transformation. We are catalysing our members to pave the way for 70GW of solar energy capacity by 2035. We represent solar heat, solar power and energy storage, with a proven track record of securing breakthroughs for all three.

Respondent details

- ♦ **Respondent Name:** Harvie Agnew
 - ♦ **Email Address:** hagnew@solarenergyuk.org
 - ♦ **Contact Address:** The Conduit, 6 Langley Street, London, WC2H 9JA
 - ♦ **Organisation Name:** Solar Energy UK
 - ♦ **Would you like this response to remain confidential:** No
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Introduction

We welcome the opportunity to respond to Welsh Governments consultation on “requirements for pre-application consultation and methods of engaging stakeholders and local communities.”

If Wales is to reach net zero by 2050, an increase in renewable energy technologies such as solar, will be needed. As the solar industry scales up to meet demand, a greater number of communities could be affected by projects near them. Therefore, delivering effective community engagement will become increasingly important throughout all stages of a solar farm’s lifecycle.

We have provided responses to questions 1 and 2 below.

Consultation

Question 1: What requirements should be set out in subordinate legislation to ensure enhanced community involvement in the consenting process, whilst ensuring proportionate consultation for all development types captured by the Bill?

We agree with the principles set out in the current DNS process, which establishes a minimum pre-application requirement. We support the continuation of this principle into the new SIPs regime.

We ask that the new consenting regime allows for a proportionate and flexible approach to community engagement. While the industry remains committed to delivering high-quality community engagement for projects of all sizes, the extent of engagement should be relative to the project’s scale and should consider both statutory requirements and goodwill efforts. For example, a solar project going through the new SIP consenting process should be expected to demonstrate greater community engagement efforts than a project being determined at Local Authority level.

We agree that prospective applications could demonstrate good practice by discussing pre-application consultations with local planning authorities and Natural Resources Wales however, this should be at the discretion of the developer. Additionally, some developers run a non-statutory consultation ahead of statutory consultation to ensure greater community engagement.

Solar Energy UK's Community Engagement Good Practice Guidance (detailed further in our response to question 2) highlights different methods to engaging with communities. One of which is the creation of a project website which acts as a helpful one stop shop for all details related to the project. This can help communities gain a better understanding of the project, the benefits it can provide and opportunities for engagement throughout the process. We would recommend that all renewable energy projects going through the SIP process have a project website.

Consultation in its many forms, is mutually beneficial to both the developer and the community. Active participation from the community in pre-application and project design through constructively raising questions, sharing and requesting information and interacting with solar developers can help the community achieve a better understanding of the project, its stages, its benefits and its impacts. There is an example of a solar developer who has designed a bespoke supporter mobilisation portal on the project website which is designed to remove the need for local people to navigate the council's planning portal. This online platform can be shared directly with the community and circulated on social media using carefully targeted advertisement following submission, making it as simple as possible for local people to support solar projects on the planning file.

Question 2: Do you have any other comments to make, or evidence to put forward in relation to how community and stakeholder involvement in the infrastructure consenting process can be improved, or any suggestions for improvements?

Yes.

To encourage good engagement between solar developers and communities, Solar Energy UK has published a [Community Engagement Good Practice Guidance](#). This seeks to promote effective engagement with people local to solar farm developments, from design through construction, operation and decommissioning. The guidance includes a chapter on good community engagement at the pre-application stages and goes through effective and inclusive methods of engaging with communities. For example, how to deliver effective community consultations. We encourage Welsh Government, Local Authorities, solar developers and communities to review the guidance at length.

Secondly, since the SIP process will inevitably demand more involvement from all parties, we are concerned that stakeholders, such as Local Planning Authorities,

Natural Resources Wales, and other statutory consultees, may struggle to respond in the statutory timeframes. Therefore, we recommend the Welsh Government provide additional support, resources, and funding to these statutory consultees to ensure they can properly engage with the projects.

In complement to this, we call for Local Planning Authorities to have dedicated community engagement officers. These officers would support the delivery of meaningful community engagement and would be able to work with developers to relay key local concerns. Currently, planning officers lack the resources to provide this level of service, as they often oversee large portfolios across multiple infrastructure projects.

Question 3: We would like to know your views on the effects that pre-application consultation requirements as part of the proposed infrastructure consenting process would have on the Welsh language, specifically, on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects to you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Response

Question 4: Please also explain how you believe the proposed policy for pre-application consultation requirements as part of the Infrastructure (Wales) Bill could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response