

National Planning Hub

A Guide to Early Engagement in Planning for Hydrogen Developers

May 2025



Introduction

Hydrogen has been identified by government and industry as having great potential to support Scotland's ambitions on net zero. The Scottish Government's [Hydrogen Action Plan](#) says:

“As a government, we are convinced that hydrogen, alongside renewable electricity, will play an extremely important part in our energy system going forward... Scotland has vast renewable energy resources. Subject to planning and consenting decisions and finding a route to market, we have a potential pipeline of over 40 GW of offshore wind generation projects.”

In achieving these ambitions, planning authorities are very keen for engagement with hydrogen developers from the outset. Research undertaken through the [National Planning Hub](#) has shown that some hydrogen developers do not realise the benefits of engaging early with planning authorities and communities, nor the opportunities that are already in place to help this to happen. This comes at a time where a number of communities have raised concerns about the perceived impacts of hydrogen proposals and there have been occasions where better engagement between developers and communities could help to provide a better understanding of hydrogen facilities' impacts and how they can be mitigated. This paper has been written to inform hydrogen developers on:

- why early engagement is important, including the benefits you will get from entering into pre-application consultation with planning authorities and communities
- what good early engagement looks like
- when early engagement should take place including the requirements on certain planning applications to engage with communities in advance of submission
- how early engagement will be made to work effectively and resources and organisations that can support you

This document highlights three ways to engage early with planning authorities and communities:

- Pre-Application consultation with communities that is required in advance for some larger planning applications
- Pre-Application advice where the applicant and planning authority discuss the proposal in advance of submission to identify possible issues and solutions, and, the information required to support the application.
- Engaging in the Local Development Plan process

Why is Early Engagement Important?

You should remember that scope, scale and look of hydrogen developments – be that for the manufacture, storage or transportation – are relatively unknown by many communities, planning officers and councillors despite hydrogen being used in Scotland for decades.

Given this, there will often be a need to explain the reasons for your development, what it will look like, the potential impacts that it may have and how these are to be mitigated. Early engagement can add value at the start of the development management process and minimise the need for you to revisit your proposal further down the line. It provides you with an opportunity to set out what you aim to achieve and to listen and respond to the views of people who may feel that they will be impacted by the proposed development.

Effective community engagement is seen to be important where there is going to be ongoing work on the proposed site. Engaging with communities and discussing the operation of, say, a hydrogen manufacturing facility, and addressing their concerns can help you to provide a better understanding of its impacts and mitigations.

Early engagement in planning is promoted in [Scottish Government's Planning Advice Note 3/2010 on Community Engagement](#) saying:

“Effective engagement with the public can lead to better plans, better decisions and more satisfactory outcomes and can help to avoid delays in the planning process. It also improves confidence in the fairness of the planning system. The Scottish Government expects engagement with the public to be meaningful and to occur from the earliest stages in the planning process to enable community views to be reflected in development plans and development proposals.”

The value of early engagement was highlighted in the independent review of the Scottish planning system commissioned by the Scottish Government [Empowering planning to deliver great places](#). This said “consensus that getting public involvement right early in the process is instrumental to securing positive outcomes” and that “There should be a continuing commitment to early engagement in planning, but practice needs to improve significantly.” It went on to say that “Front loading engagement remains a valid and attainable goal and must be at the core of the planning system. Planning authorities and developers need to promote innovation which empowers communities to get actively involved in planning their own places.”



Research undertaken by Nick Wright and Steven Tolson for the Scottish Land Commission on [The Value of Early Engagement in Planning](#) outlined a number of benefits of early engagement, including:

- providing benefits to any proposal
- speeding up the process
- providing an opportunity to explain and inform
- helping to secure planning consent
- ironing out problems early on
- improving development quality
- building trust
- building sense of community

In 2019, Grosvenor published research [Rebuilding Trust](#) that found that trust in the planning system across the UK was low given that those who had interacted with it are likely to think large-scale development has had a negative impact on their local area. When asked how to increase trust, the most popular response was holding developers and councils to account for what they promised; followed by more opportunity for local people to influence the outcome of development and more transparency from private developers.

Community Councils

You should remember that community councils are an important part of the planning application process. They need to be consulted as part of any Pre-Application Consultation (PAC) exercise and may ask for formal consultation on specific applications. Planning authorities will also directly consult with community councils on planning applications for development likely to affect the amenity of the community council area. Community councils can comment on planning applications – including in support of or objecting to the proposed development. Proactive early engagement with community councils can be a useful way of engaging in a dialogue that will allow you to explain your proposal and guide you on what you can do to address concerns. You can read more at the [Scottish Community Councils website](#).

The remainder of this document discusses opportunities for developers to engage early with both planning authorities and communities.



Statutory Pre-Application Consultation

Context

Scottish Government explains the requirements of Pre-Application Consultation (PAC) in [Planning Circular 3/2022 Development Management Procedures](#). This section summarises these, but you should refer to the circular when considering the need for, preparing for and undertaking PAC.

PAC aims to help communities to be better informed about major and national development proposals in their area. It works to allow communities to contribute their views on a proposed application before it is formally submitted to the planning authority. It is a statutory requirement for major and national developments.

Determining whether PAC is required

A screening process is available whereby prospective applicants can seek the planning authority's view on whether PAC is required. For most hydrogen manufacture or storage projects it is likely that PAC will be required if:

- the proposed planning application proposes a National Development as set out in the [4th National Planning Framework](#)
- the development is a Major Development as defined in The Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 ('the Hierarchy of Developments Regulations'). This includes:
 - the construction of a of a building or structure as an office, for research and development, for industrial processes or for use for storage where the gross floor space of the building, structure or other erection is or exceeds 10,000 square metres; or the area of the site is or exceeds 2 hectares.
 - the construction of new or replacement roads, railways, tramways, waterways, aqueducts or pipelines exceeds 8 kilometres.
 - the construction of an electricity generating station where the generation capacity is or exceeds 20 megawatts;
 - any development not falling wholly within any single class of development described in the Hierarchy of Development Regulations, where the gross floor space of any building, structure or erection constructed as a result of such development is or exceeds 5,000 square metres, or where the area of the site is or exceeds 2 hectares.

This is merely a guide. You should always check the Hierarchy of Developments Regulations.

What you need to do in undertaking PAC

The section below summarises what a prospective applicant should do for the PAC. You should refer to [Planning Circular 3/2022 Development Management Procedures](#) for full details

If you are the prospective applicant, PAC can be used positively and constructively to allow you to make best use of engagement with the community early in the process, especially if you make it meaningful and accessible for communities. It can allow you to share your ambitions and aspirations, explain what you see as the benefits of your proposal and outline what you have done to minimise the impact it will have locally. PAC will enable you to hear community voices and for you to consider how you can respond to these. It can inform how you may want to make changes to the proposal to accommodate the views that you have heard.

Where PAC is required, the prospective applicant must provide to the planning authority a 'proposal of application notice' (PoAN) at least 12 weeks before submitting the planning application. This needs to include:

- a description in general terms of the development
- the address of the development site and a plan showing the outline of the site where the development is to be undertaken
- a description of the consultation proposed

The planning authority has 21 days to respond and specify any additional notification and consultation it wishes to see undertaken beyond the statutory minimum. After a minimum of 12 weeks from the giving of the PoAN, and after having met the statutory requirements and any additional requirements specified by the planning authority, an applicant can submit the application along with the required written PAC report. An application must be made within 18 months from when the PoAN is given to the planning authority.

If you are the prospective applicant, you are required to hold at least two events for members of the public where they can make comments on the proposals. The final event should provide feedback to the public on the views obtained through the process. You must consult every community council within or adjoining the land on which the proposed development is situated. This may include community councils in a neighbouring planning authority.

The PAC process will work best when it is undertaken transparently and helps those engaged to see how it has influenced and shaped the eventual proposal. Given this you should consider the timing of the PAC in relation to pre-application discussions with the planning authority and statutory consultees as these may highlight areas for discussion and considerations that may impact on the scope and content of the proposal. You should also think about how best to approach communities in advance of the PAC to inform how the engagement is undertaken.

In drafting information to support your PAC you should bear in the mind the audience and ensure that it is accurate, easy to understand, jargon free, accessible and relevant.



Pre-application Advice

Scottish Government highlights the importance and benefits of pre-application advice in [Planning Circular 3/2022 Development Management Procedures](#), and has published a [template for processing agreements](#). This section summarises these, but you should refer to them for full details.

Benefits

Engaging voluntarily with planning authorities in advance of applying for planning permission can provide benefits for developers. Indeed, the Scottish Government very much encourages pre-application discussions between the prospective applicant and the planning authority, agencies and other bodies which will have to be consulted on any subsequent planning application.

This is different and separate from PAC and provides an opportunity to identify potential issues early in the process and therefore allow for discussion on how best to ensure that the planning application meets the policy priorities. It will also help identify what information will be required by whom and when it is required to aid the assessment of the application. This will support you in designing development and should also improve the quality of your application. In turn this may help the planning authority to move towards a decision more quickly.

Benefits of pre-application advice can include:

- You will receive advice on the information that you will need to provide to support your planning application and the technical issues that might arise in considering it such as for example; biodiversity, noise, flooding, ecology and transport.
- You will receive guidance in preparing a good quality submission that is acceptable to the planning authority, be able to enter negotiations with the planning authority and gain a fuller understanding on how the planning authority's planning policies will be applied to your proposal.
- You will get an indication if your proposal is considered to be acceptable or unacceptable in principle, thereby giving you more certainty on the likelihood of success which can save time and cost of pursuing an application that may be refused.
- You will be informed of any likely requirement for contributions towards the provision of infrastructure.

Many planning authorities now offer a pre-application advice service and encourage and welcome the opportunity to provide advice before you formally

submit your planning application. The availability, content and costs of the service can vary across planning authorities, and may differ according to the type and scale of the proposed development. It is best to check the appropriate planning service's website for full details on this.

Processing Agreements

Planning authorities can also work with applicants to enter into processing agreements with planning applications for national and major developments and for substantial or complex local developments.

A processing agreement is a project management tool that details the processes involved in determining a planning application. It helps to identify the type of information required from all involved in the process, including the applicant, the planning authority and consultees. In doing this it sets out the timescales envisaged for each of the stages of the process. Within Planning circular 3/2022: development management procedures, the Scottish Government has highlighted how the pre-application stage is the most appropriate and effective point to conclude the terms of a processing agreement.

The aim of processing agreement is to have early engagement between the planning authority and applicant and to provide transparency in the decision-making process for all involved, through providing clear lines of communication. In turn, this can provide predictability on when each stage of the application process will take place, and lead to faster decision-making.

The Scottish Government has published a [template for processing agreements](#). This sets out the details required to be provided by the applicant and a checklist and flow of what should be done at the different stages of the planning application. This includes:

- The pre-application stage, covering:
 - key meeting dates
 - receipt of proposal of application notice
 - if further pre-application discussions are required
 - The Environmental Impact Assessment (EIA) screening and scoping opinion
 - What liaison is required with consultee at this stage
 - The type of information required and when
 - Other consents required
 - Issues to be dealt with by legal agreement



- The application stage including detail on:
 - when liaison meetings take place
 - the agreed application submission date and target
 - if the application is to be submitted via the e-planning portal
 - neighbour notification
 - any adverts to be published
 - consultation with statutory and non-statutory consultees
 - draft conditions and legal agreements
 - the committee report, committee site visit and committee meeting
 - notification to the Scottish Ministers, if required
- The post-application stage, detailing:
 - preparation and conclusion on legal agreements
 - The discharging of conditions



Local Development Plans

Scottish Government has published [Scottish Government Planning Guidance: Effective Community Engagement in Local Development Plans People and planning](#) that sets out their expectations. They have also published [Local development planning guidance](#). You should refer to these for fuller details on guidance.

The planning system in Scotland is plan-led. The statutory ‘development plan’ comprises the National Planning Framework (NPF) which covers all the country, and the Local Development Plan (LDP) which covers each planning authority area.

In developing local development plans, planning authorities must have regard to [Scottish Government Planning Guidance: Effective Community Engagement in Local Development Plans People and planning](#). This highlights that engagement in local development planning should be:

- early – and not left only to later stages, such as when a Proposed Plan is published for formal consultation
- collaborative – so that people and organisations are encouraged to form partnerships and work together
- proportionate – not every single person in an area will want to be involved, but a wide range of views should still be sought
- meaningful – enabling discussion about things that affect people and including feedback, so that, even where a decision is not what they hoped for, people understand how their views have been considered

The above guidance also highlights the importance of the planning authority engaging on the impact assessments that support the plan as well.

From a developer perspective, Local Development Plans (LDPs) are important as they are be used by planning authorities as the basis for making decisions on planning applications, unless other material considerations say otherwise. Every planning authority is obliged to publish a LDP that sets out what places should look like over the coming 20 years and each LDP needs to be updated every 10 years. LDPs set out the preferred locations for new developments including housing, business and energy and what should be protected.

Given this, engaging with the planning authority through its LDP process will allow you set out the case for the allocation of certain sites for specific developments and to make your views known on the content and ambitions of the policies it contains.

Although the planning authority is responsible for preparation the LDP, they need to engage with a wide range of stakeholders including of the local or national park authority, agencies, communities, voluntary organisations, land owners and developers.

Local development planning has three key stages: evidence gathering, plan preparation and delivery of the plan.

There are several opportunities for developers (and others) to engage in the production of the LDP.

Development Plan Scheme

An important thing to keep track of in the envisaged timelines on LDP preparation and opportunities to engage, is the Development Plan Scheme (DPS). The DPS should be prepared at least annually by the planning authority (or when directed by the Scottish Ministers). It includes a Participation Statement. This is important in allowing the planning authority to inform stakeholders when and how they can get involved in the development process and keep them up to date on progress being made in the preparation of the LDP. The DPS must include:

- the proposed timetable for the preparation of the LDP
- the proposed timings details and what will be involved for each of the stages of LDP plan preparation including:
 - publication of the Evidence Report
 - publication of the Proposed Plan
 - submission of the Proposed Plan to the Scottish Minister
 - expected adoption of the LDP
- a Participation Statement that sets out when consultation is likely to take place, who this is likely to involve and what it will comprise, including how the public will be engaged

Evidence Reports

Evidence informs plan making, can help to justify the plan's content and provide a baseline for later monitoring.

The DPS should identify an appropriate programme for evidence gathering and its monitoring and review, to ensure that evidence is maintained. In preparing the LDP planning authorities must publish an Evidence Report that is informed by the views of those who will be affected by the plan and are involved at its implementation stage.



Guidance on Development plans published by Scottish Government specifically says

“Where known, the Evidence Report can identify the key strategic grid improvements associated with both transmission and distribution network companies.” and that “Existing or emerging strategies for the delivery of renewables are relevant considerations during the preparation of the Evidence Report, alongside strategies for the delivery of emerging low-carbon and zero emissions technologies including hydrogen and carbon capture utilisation and storage (CCUS). For example, the location of emerging projects for the production, storage and transportation of hydrogen identified through the Hydrogen Action Plan (December 2022) may be applicable.”

The Evidence Report must be agreed by the full council and approved by Ministers.

Proposed Plan

The preparation of the Proposed Plan should be closely informed by the baseline evidence in the agreed Evidence Report. The planning authority must consult on the Proposed Plan for a minimum of 12 weeks and publish the Proposed Plan, the Evidence Report that supports it and the proposed Delivery Programme.

As part of this consultation, a notice must be published in a local newspaper circulating in the area and on the internet containing:

- a statement that the proposed LDP has been prepared and where and at what times it may be inspected,
- a brief description of the content and purpose of the proposed LDP;
- details of how further information may be obtained regarding the proposed LDP, including that it is to be published on the internet;
- a statement that any person wishing to do so may make representations on the content of the proposed LDP; and
- information as to how and to whom any representations should be made.

Planning authorities should consider and respond on the suitability of proposals and ideas. Although the decisions on what is included in the LDP is for the planning authority they should be informed by the views of those who engaged.



Good Practice Resources

There are a number of relevant good practice resources on early engagement in planning. These include:

[The Place Standard tool](#)

The Place Standard tool provides a simple framework to structure conversations about place. It allows you to think about the physical elements of a place (for example its buildings, spaces, and transport links) as well as the social aspects (for example whether people feel they have a say in decision making). The tool provides prompts for discussions, allowing you to consider all the elements of a place in a methodical way. The tool pinpoints the assets of a place as well as areas where a place could improve.

[The Our Place website](#)

This provides information, tools and resources to help support the development of places and services that improve health, prosperity, quality of life and protect our environment.

[Scottish Government Planning Guidance: Effective Community Engagement in Local Development Plans People and planning](#)

This guidance aims to support planning authorities and all users of the planning system, including communities, members of the public and others undertaking engagement activities.

[Planning Aid Scotland Guide to Effective Community Engagement \(SP=EED\)](#)

SP=EED is Planning Aid Scotland's practical guide to undertaking effective community engagement in planning and is freely available to download. It is referred to in the Scottish Government Planning Advice Note 3/2010 as a benchmarking tool for community engagement.

[National Standards for Community Engagement](#)

The National Standards for Community Engagement are good-practice principles designed to improve and guide the process of community engagement.

[Community Engagement: Everything you need to know](#)

Web based resources to support community engagement by the Scottish Community Development Centre.

[The Value of Early Engagement in Planning](#)

Nick Wright and Steven Tolson for the Scottish Land Commission.

[Validation and Determination Guidance \(PDF\)](#)

HOPS Validation and Determination Guidance for Planning Applications

Conclusion

This paper has aimed to show the benefits of engaging early with planning authorities and communities when you are considering submitting a planning application. It has also outlined the opportunities for doing this. Key to success will be, where possible, transparency, openness and a commitment to work with the different partners involved – including planning authorities, key agencies and communities – to create a constructive dialogue on your proposals.

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