



RTPI Scotland

mediation of space · making of place

Royal Town Planning Institute Scotland

18 Atholl Crescent

Edinburgh EH3 8HQ

Tel: 0131 229 9628

Fax: 0131 229 9332

E mail: scotland@rtpi.org.uk

Website: www.rtpi.org.uk/scotland

Patron HRH The Prince of Wales KG PCGCP

Email to energystrategy@gov.scot

30 May 2017

Dear Sir/Madam,

Scottish Energy Strategy: the future of energy in Scotland – consultation response

The Royal Town Planning Institute (RTPI) is the champion of planning and the planning profession. We work to promote the art and science of planning for the public benefit. We have around 2,100 members in Scotland and a worldwide membership of over 24,000. We:

- Support policy development to improve approaches to planning for the benefit of the public; maintain the professional standards of our members;
- Support our members, and therefore the majority of the planning workforce, to have the skills and knowledge they need to deliver planning effectively;
- Maintain high standards of planning education;
- Develop and promote new thinking, ideas and approaches which can improve planning;
- Support our membership to work with others who have a role in developing places in Scotland;
- Improve the understanding of planning and the planning system to policy makers, politicians, practitioners and the general public.

Overview

RTPI Scotland's response to this consultation focuses on highlighting areas where there are stronger synergies to be made with the development planning system. The draft Energy Strategy does not identify the full potential of the planning system to support delivery of the Government's priorities for energy demand and supply through collaborative policy making and implementation. This is relevant to both placemaking with the goal of lowering energy demand and delivering energy supply infrastructure to meet residual demand.

The current review of the planning system offers a critical opportunity to maximise the potential of the planning system as a tool to support the realisation of a low carbon, affordable and sustainable national energy approach.

Answers to consultation questions

2. What are your views on the actions for Scottish Government set out in Chapter 3 regarding energy supply? In answering, please consider whether the actions are both necessary and sufficient for delivering our vision.

RTPI Scotland acknowledges that the consultation identifies the 'land use planning' system as a tool for delivering energy supply infrastructure, and in particular development management and development plan policies. At the national level the National Planning Framework and Scottish Planning Policy are noted as having a supporting role in expressing Government ambition for energy supply. However, the narrowness of this understanding of the role of planning in delivering energy infrastructure is disappointing. This is especially true in the context of the current review of the planning system, which seeks a more collaborative and delivery focused role for planning at the national, regional and local scales.

The Scottish Government consultation paper *Places, People and Planning* proposes an 'enhanced' National Planning Framework that 'continues' alignment with other national strategies, including the Energy Strategy. Despite this, there is little or no evidence in the draft National Energy Strategy of consideration of how energy demand and supply will be impacted by trends in future development in Scotland; or vice versa.

Energy demand is inherently spatial, reflecting the geography of where people and industry consume power. The location of energy supply infrastructure in relation to other land use is therefore important. Development planning at the national, regional and local scales offers a key opportunity to plan energy supply infrastructure that reflects the spatial nature of demand, making sure that it is in line with the delivery of other infrastructure, housing, and community facilities.

As part of our engagement with Scottish Government on *Places, People and Planning* RTPI Scotland prepared a thinkpiece, *Making an infrastructure first approach a reality*. The thinkpiece is a response to the ongoing failure to plan for and deliver the infrastructure that Scotland needs to achieve a sustainable future, which of course includes energy infrastructure. This planning and delivery demands coordination between a wide range of professionals in all scales of government, key agencies, and the private sector. RTPI Scotland believes that planners are very well placed to provide this coordinating role, and an enhanced National Planning Framework (or National Development Plan) could provide the impetus for a more collaborative approach to problem solving.

The thinkpiece includes two central proposals. The first is for a national mechanism with statutory responsibility to audit national infrastructure demand and provision, and supervise by collaboration with colleagues across government the delivery of new projects. Such a vehicle would clearly be relevant to the delivery of energy supply infrastructure. The second proposal is for the introduction of a new non-local infrastructure levy. A copy of the thinkpiece is enclosed with this response.

3. What are your views on the proposed target to supply the equivalent of 50% of all Scotland's energy consumption from renewable sources by 2030? In answering, please consider the ambition and feasibility of such a target.

The Land Use Strategy 2016 – 2021 highlights how it should inform the National Planning Framework and Scottish Planning Policy, as well as the Government's sectoral strategies. It is important to note that the Land Use Strategy 2016 – 2021 should therefore inform Government policy with regard to delivering the infrastructure necessary to meet the renewables target. There are many conflicting demands on Scotland's land, and therefore a strategic approach is needed to ensure that sufficient space is provided to host renewable energy generation infrastructure.

8. What are your views on the priorities presented in Chapter 4 for transforming energy use over the coming decades? In answering, please consider whether the priorities are the right ones for delivering our vision.

The consultation acknowledges a role for increasing the proportion of journeys made by active travel as a means for reducing energy demand. However, as with placing the delivery of energy supply infrastructure in the wider context of national planning and development, RTPI Scotland urges the Scottish Government to consider a greater role for planning and placemaking in meeting Scotland's energy challenges. Good placemaking can reduce the need to travel, increase uptake of active travel, and reduce the need to use energy for artificial heat and light.

RTPI Scotland submitted evidence to the Parliamentary Committee inquiries into the draft Climate Change Plan (Third Report on Policies and Proposals) in February 2017. In our evidence we encouraged the Government to think beyond the emissions and energy demand reductions to be gained from rolling out technological advances in building fabric and vehicles, to consider how we can better deliver places that enable people to make sustainable choices. The [report](#) of the Local Government and Communities Committee on the draft Climate Change Plan endorses this approach, expressing disappointment that the Plan does not consider the role of planning in encouraging modal shift in transport and directing development to previously-developed sites, for example.

We urge the Scottish Government to further consider how a holistic approach to infrastructure provision and placemaking as a whole could positively impact energy demand and therefore the type and extent of supply infrastructure needed to meet it.

9. What are your views on the actions for Scottish Government set out in Chapter 4 regarding transforming energy use? In answering, please consider whether the actions are both necessary and sufficient for delivering our vision.

In line with our answer to question 8, RTPI Scotland suggests that the Scottish Government grasps the opportunity of the current simultaneous review of the planning system, energy strategy (and transport strategy) to take a more holistic approach to addressing energy demand and supply. Delivering the infrastructure that Scotland needs, and creating places fit for the 21st century, demands greater and more coordinated collaboration between planners, utilities providers, key agencies, communities, landowners, developers and funders. Planners' understanding of environmental, geographic, social and economic context means that they are very well placed to instigate this coordination.

As part of our response to the recent Scottish Government consultation *Places, People and Planning* RTPI Scotland prepared a thinkpiece exploring the introduction of a 'Chief Planning Officer' role in local authorities. This role would ensure that planning were consulted on

corporate decisions that could impact and places and development. RTPI Scotland believes that this would help to coordinate investment activity so that projects across sectors, for example energy and education, were complementary to each other. A copy of the thinkpiece *A statutory Chief Planning Officer in Local Authorities* is included with this response.

11. What are your views on the priorities presented in Chapter 5 for developing smart, local energy systems over the coming decades? In answering, please consider whether the priorities are the right ones for delivering our vision.

RTPI Scotland in principle supports more local solutions to energy challenges. We submitted a response to the Scottish Government consultation *Local Heat and Energy Efficiency Strategies and Regulation of District Heating*. This response focused on the anticipated role for planners in implementing these solutions, and the subsequent investment in skills and capacity that will therefore be necessary. This is especially pertinent given the extremely stretched resources of local authority planning departments at the current time.

17. What are your views on the proposed approach to deepening public engagement set out in Chapter 6?

RTPI Scotland is concerned that the consultation does not consider the links to emerging greater community involvement in the spatial planning system, nor Community Planning. With regard to the implementation of the National Energy Strategy, Local Outcome Improvement Plans could be a means of identifying ambitions for community level solutions to energy supply and regulation of demand. In its consultation on the future of the planning system *Places, People and Planning* the Scottish Government made the widely supported proposal that a statutory link should be created between spatial planning and Community Planning. This could enable local development plans to include a spatial expression of the community ambitions included in Local Outcome Improvement Plans and Locality Plans.

RTPI Scotland therefore suggests that the final Energy Strategy considers more deeply how its implementation could at least in part be delivered alongside the ongoing agenda of community empowerment in Scotland.

I trust that you will find these comments helpful. If you would like to discuss any aspect, or require clarification of any points raised, please contact me on 0131 229 9628 or by email to kate.houghton@rtpi.org.uk

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K Houghton', written in a cursive style.

Kate Houghton
Policy and Practice Officer