



**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](mailto:scotland@rtpi.org.uk)

Website: [www.rtpi.org.uk/scotland](http://www.rtpi.org.uk/scotland)

Patron HRH The Prince of Wales KG PCGCP

Email to [energystrategy@gov.scot](mailto:energystrategy@gov.scot)

30 May 2017

Dear Sir/Madam,

### **Onshore wind policy statement – RTPI Scotland 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.

Over the last 20 years, since the first generation large scale wind farms went online, RTPI members across the public and private sectors have been key to developing, implementing and fine-tuning the planning policy and development management framework for the effective siting and design of wind farms. Overwhelmingly this roll out has been a great success. Scottish experience with regard to procedures such as EIA, public consultation and landscape and visual assessment has been showcased as a successful example of good spatial planning around the world. The review of the planning system and the concurrent development of the new Scottish Energy Strategy offer key opportunities to build on this past success and further advance onshore wind energy generation as part of the transformation to a low carbon Scotland.

We have answered those consultation questions of particular relevance to planners and the planning system. RTPI Scotland has also submitted responses to the Scottish Energy Strategy and other accompanying consultation documents; our comments should therefore be read within this wider context.

## Answers to consultation questions

### **2.1 What is your view on the appropriate approach for the inclusion of wind farm efficiency as a material consideration in the Section 36 consents guidance?**

RTPI welcomes the inclusion of wind farm efficiency as a material consideration. This will hopefully be an effective way of moving energy policy to implementation through the planning system; the kind of collaborative approach that the current planning review is seeking. However, as many of the best wind resource sites have now been taken, there will be a close read-across to the repowering agenda alongside extensions of wholly new sites. It will be important that unintended consequences are avoided, specifically where the regulation of efficiency is included in a planning condition. In that regard RTPI Scotland would be pleased to nominate a chartered planner to sit on the working group mentioned on page six of the consultation.

### **2.2 In this chapter, the Scottish Government has identified three areas of activity where it can offer support to a route to market for onshore wind – do you agree with the issues identified?**

RTPI Scotland agrees that the planning system has an essential role in facilitating the planning and deployment of all energy infrastructure, including onshore wind. As stated above, the ongoing review of the planning system is an important opportunity to improve its effectiveness in discharging this role. Two particular areas where focus is needed are resourcing, and the national approach to infrastructure delivery.

#### *Resourcing*

Since 2009 23% of staff have been lost from local authority planning departments in Scotland. And, these same departments on average recover only 63% of the cost of processing planning applications. We acknowledge that many onshore wind proposals are processed by the Scottish Government as s.36 applications. Nonetheless wind farms beneath the 50MW threshold, extensions to above 50MW wind farms, and monitoring and discharge of conditions are the responsibility of local planning authorities and therefore demand skills and time resources. If the onshore wind industry in Scotland is to thrive the planning service must be resourced to fulfil its obligations both in development planning and development management.

With reference to wind energy, the unspecified proportion of the fee for s.36 applications assigned to a planning authority as set out in the Revised Scale of Fees by Applicants for Consent under the Electricity (Applications for Consent) Amendment (Scotland) Regulations 2005 is too vague. RTPI Scotland believes Scottish Government should take a view to increasing the fee *pro rata* to match the new maxima set out in The Town and Country Planning (Fees for Applications and Deemed Applications) (Scotland) Amendment Regulations 2017. This would help to maintain the high quality service delivery that Scottish Ministers and energy suppliers rightly expect across 'major' category planning and s.36 applications in the onshore wind energy sector.

Also critical to this will be ensuring that targets for renewable energy generation, that will require a contribution from onshore wind, are realistic in terms of the capacity to process consents.

RTPI Scotland is working with Scottish Government to achieve a long term and sustainable solution to the resourcing challenge faced by local authority planning departments. Only by achieving this will local authorities be well equipped to discharge their duties efficiently, while making consistently good decisions that take into account particular local circumstances.

### *Infrastructure*

The planning and delivery of infrastructure in Scotland is currently under serious constraint. RTPI Scotland believes that a more proactive and collaborative approach to planning and delivery could make a major contribution to overcoming this challenge. There should be clear links between national government strategies; relevant here of course are the National Planning Framework and the Onshore Wind Policy Statement.

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 - including onshore wind - that reflects the spatial nature of demand, making sure that it is in line with the delivery of other infrastructure, housing, and community facilities.

The planning review proposed an enhanced National Planning Framework, and RTPI Scotland has proposed that this idea is expanded to a National Development Plan, that also includes policies on future development. Whatever form the updated strategy takes, there should be strong links drawn between it and energy infrastructure delivery strategies, to ensure spatial consideration of the latter. This will help to ensure that competing demands on land are strategically considered and balanced.

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, including onshore wind. The second proposal is for the introduction of a new non-local infrastructure levy. A copy of the thinkpiece is enclosed with this response.

### **3.1 Do you agree with the Scottish Government's proposed approach to repowering?**

RTPI Scotland welcomes the acknowledgement of the important role of SNH in advising on s.36 applications for repowering. The expertise of this key agency should continue to be valued and respected.

**4.1 Do you agree or disagree with the proposals to pursue option 3, a 'locally coordinated approach'? Please provide reasons to support your answer.**

RTPI Scotland supports the principle of this approach. Coordinating public and private strategies at the local level has synergies with the increased collaboration currently being pursued in the planning system through the planning review. As with any form of development, facilitating communication and cooperation between developers is likely to help maximise the effectiveness and efficiency of onshore wind infrastructure, and avoid its provision on an ad hoc basis. The local development planning process could provide the forum for this kind of cooperation.

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](mailto: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