



RTPI Scotland

mediation of space · making of place

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30 May 2017

Dear Sir/Madam,

Energy Strategy – Scotland’s Energy Efficiency Programme (SEEP) – 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.

Overview

A common thread that runs through the climate change and energy policy documents and strategies that have been published by the Scottish Government in 2017 is the disappointing omission of the emissions reductions to be won outwith upgrading building fabric and vehicle technology. This includes the draft Climate Change Plan (Third Report on Policies and Proposals) (RPP3), as well as the Scottish Energy Strategy and four associated consultation documents. RTPI Scotland submitted evidence to all of the Scottish Parliamentary committees with responsibility for scrutinising RPP3 and gave oral evidence to the Local Government and Communities Committee. Our evidence highlighted the gains to be made in emissions reductions through planning the density and layout of places, to enable people to make sustainable choices, and reduce the need to travel and use artificial light and heat. The subsequent [report](#) of the Committee on RPP3 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.

RTPI Scotland welcomes the ambition of Scotland's Energy Efficiency Programme in improving the efficiency of individual buildings. Notwithstanding this, it is disappointing that no links are made to other means through which Scotland's emissions targets can be achieved, including through planning more sustainable places. We strongly urge the Scottish Government to develop a more holistic and collaborative approach, where improvements to building fabric are accompanied by active place making that has cutting emissions as a core objective.

The ongoing review of the planning system, with its focus on collaborative working, provides a timely opportunity to create stronger links between the planning of places and energy policy. Our comments below highlight the opportunities that town planning provides that are relevant to energy efficiency ambitions.

Planning, place making and behaviour change

Location, density and design of development

Planning can influence the location, density and design of development. When realised together in developments, these three factors can enable people to make more sustainable choices in their day to day lives. Local development plans play a major role in delivering these criteria, and Scottish Planning Policy (SPP) outlines a number of principles regarding which types of locations and development are generally considered 'sustainable'. For example, there is a preference for developing previously-developed ('brownfield') sites before greenfield ones, and support for higher density development. Likewise, SPP (paragraph 45) recognises the important role for design in making it easier for all people to move around a place by prioritising accessibility for people, not vehicles.

Planning development in this way can help to ensure that cities, towns and villages grow to accommodate and support a changing population sustainably. Walking, cycling and use of public transport can be made easier while private car journeys are discouraged by informing the density of development, its location, and how it is integrated into other land uses such as employment areas and schools. It is possible to measure changes in the form of the built environment delivered in this way, for example by monitoring changes in travel-to-work distances over time.

There are actions that can be taken by the government to try and ensure that the best sites for development in sustainability terms are also deliverable for developers, so called 'market-making'. This can be done through site assembly, site remediation and preparation and installation of supporting infrastructure, helping to overcome some of the financial barriers to developing more complicated sites.

Engaging communities

As well as enabling behavioural change through planning for places that encourage people to make sustainable choices, the planning system provides opportunities to engage with communities, and potentially to conduct a conversation about cutting energy use.

The recent Scottish Government consultation on the future of the planning system, *Places, People and Planning* proposes that existing community planning tools should be linked with stronger community place planning tools. RTPI Scotland supports this. We suggest that the processes for preparing community plans dealing with services, budgeting and physical development could be a forum for conversation about the behavioural changes, and the

support needed to enable them, necessary for communities to cut their carbon emissions. Local Outcome Improvement Plans and Locality Plans could also be useful fora for communities to articulate their ambitions for cutting emissions, including through SEEP and/or place making.

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@rpi.org.uk

Yours sincerely,

A handwritten signature in black ink, appearing to read 'KHoughton', with a stylized, cursive script.

Kate Houghton
Policy and Practice Officer