



# RTPI Scotland

mediation of space · making of place

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30 May 2017

Dear Sir/Madam,

## **Talking 'Fracking' – A consultation on unconventional oil and gas – 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.

The RTPI does not take a view on the principle of unconventional oil and gas extraction. In the event that relevant licenses are issued, however, as identified in the consultation document the planning system will be a critical part of the regulatory framework. Planning will have significant responsibility for ensuring that unconventional oil and gas exploration is carried out safely and in the most economically, environmentally and socially sound way possible.

Our response to this consultation therefore focuses on question 7, 'What are your views on the regulatory framework that would apply to an unconventional oil and gas industry in Scotland'. If the Scottish Government decides to permit unconventional oil and gas extraction it is essential that the planning system is equipped with the resources and skills it needs to make good quality decisions, including the consideration and imposition of planning conditions where relevant. As well as decision-making on individual planning applications, the planning system will have an extremely important role providing a forum for discussion

between potential applicants for unconventional oil and gas activities, communities, and the general public more widely.

Since 2009 planning departments in local authorities across Scotland have lost 23% of their staff. Meanwhile, on average local authorities only recover 63% of the cost of processing a planning application. These statistics highlight the extent to which resources in local authority planning departments are stretched. If the Scottish Government is to depend in part on planning to ensure that unconventional oil and gas extraction happens in an effectively regulated environment, with meaningful opportunities for community and stakeholder engagement, it must ensure that planning departments are resourced to fulfil this role. RTPI Scotland has submitted more detailed ideas on how the resourcing challenge can be overcome in our recent response to the Scottish Government consultation *Places, People and Planning*, and will continue to work with Government to see the realisation of a long term sustainable solution.

RTPI Scotland has also submitted a response to the consultation on the Scottish Energy Strategy, and in this we highlight the opportunities for energy and planning professionals to work more closely together. Forward planning and placemaking could have profound impacts on energy demand, and therefore decisions about where new supply infrastructure should be located. With particular relevance to unconventional oil and gas, if the extraction of this is to be permitted, the next iteration of the National Planning Framework should account for relevant locations. We also note that the evidence supplied by the Committee on Climate Change to the Scottish Government states that achieving Scotland's emissions targets will require that domestic unconventional oil and gas extraction should displace, not add to, consumption of imported fossil fuels. It is therefore opportune to highlight in this consultation the critical role for spatial development planning and placemaking in supporting reductions in energy demand. This includes by influencing behaviour, making it easier for people to make sustainable travel choices, and reducing the need for artificial heat and light.

As a result of the decision to permit unconventional oil and gas extraction in England the RTPI has produced a guide, *Shale Gas Extraction – Fracking proposals and the planning system*, as an aid for politicians, communities and members of the public involved in the planning stages of such proposals. While particularly relevant to the English procedural context, this contains information regarding community engagement that the Scottish Government might find useful to consider. In the event that the Scottish Government decides to permit unconventional oil and gas extraction RTPI Scotland would be pleased to work with them to prepare similar guidance appropriate to the Scottish context. We have enclosed a copy of the guide with this consultation response.

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 'KHoughton', with a stylized flourish at the end.

Kate Houghton  
Policy and Practice Officer