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 2,200 members in Scotland and a worldwide membership of nearly 23,000. 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.

Our evidence to the Economy, Energy and Tourism Committee’s Inquiry into Scottish Government’s Renewable Energy Targets is set out below, addressing the two questions posed under the heading Planning and consents.

The current planning system is fit for purpose in enabling and supporting the delivery of objectives including sustainable development, economic growth and great places for people, but it is increasingly under strain from an increased number of planning applications for renewable energy developments. In order to continue to support the achievement of the Scottish Government’s renewable energy targets, focused and regular guidance and support is needed, including:

- Spatial guidance, indicating areas of priority for renewable developments.
- Training, staffing and funding support in proportion to the increased number of renewable development applications being dealt with, and regular technical updates outlining developments in the renewable sector.
- Improved consultation processes at national and local levels to allow local communities to involve themselves in the setting and achievement of national targets, and in the ownership, location and running of local renewable developments. This should start with the publication for consultation of the Strategic Environmental Assessment of the Scottish Government’s 2020 Routemap for Renewable Energy in Scotland.
- Guidance on criteria to use when assessing applications and how to integrate national policy into local decisions.
- An initial focus on reducing energy demand through improvements in energy efficiency, including:
  - integration of building regulations with planning policy to improve insulation and energy efficiency in new and existing buildings; and
coordination between renewables policy and infrastructure planning to support the consumption of energy near source, and to ensure that grids and distribution networks are available and appropriate to new developments as they become operational.

IS THE PLANNING SYSTEM ADEQUATELY RESOURCED AND FIT FOR PURPOSE?

Role of the Planning System
The current planning system is fit for purpose in enabling and supporting the delivery of objectives including sustainable development, economic growth and great places for people. If used properly, the planning system can be of great help in attaining Scottish Government renewable energy targets efficiently and effectively, ensuring that plans, developments and changes made now are beneficial in the short and long terms. The planning system can help to ensure that new developments are sited appropriately, and constructed in ways which are efficient, functional and sensitive to their surroundings. It should ensure that conflicting opinions and competing demands on land are taken into account; that there is sufficient coordination between different projects to ensure that targets are met; and that infrastructure and efficiency considerations are attended to. The planning profession aims to create great places for people and in so doing to deliver the right things in the right place at the right time.

The 2006 Planning Act, which has been introduced incrementally, has put in place a new approach to planning which is making planning more effective, efficient and inclusive. Given this, and the fact that the final element of the new Act, the changes to Householder Permitted Development rights, only came into effect earlier this month, there is no need for radical reform of the planning system. However, we do call for more confident planning, based on political commitment, professional excellence and effective community engagement.

Strategic Environmental Assessment
The Scottish Government’s 2020 Routemap for Renewable Energy was published in July 2011 and provides details of the most recent targets and actions needed to achieve them. However, as yet the Strategic Environmental Assessment of the Routemap has not been published for consultation. Had this been published it would have provided a fuller picture of the impacts that achieving the targets could have, and allowed for an examination of steps that could be taken to mitigate adverse impact.

The response to the current targets focuses on their achievement through the provision of onshore wind. It should be borne in mind that other types of renewable energy also have roles to play. Some of these will require planning permission, and there is merit in considering how their assessment can be better linked to existing planning processes. In particular, the links between the land use planning system and marine planning should be made more explicit and should be more joined-up, to ensure that the decisions made in each are complementary to one another.
National Strategy and Co-ordination
Apart from the breakdown of the renewable energy targets into heat, electricity, transport and energy efficiency, there is no clear indication in the Routemap of how the targets are to be achieved at a national level. National Planning Framework 2 and Scottish Planning Policy include guidance on how to approach and encourage renewable energy developments from a planning perspective, but both quote earlier, less ambitious, targets. Neither document lays out specific spatial planning guidance on the siting of renewable developments across the country, nor on the question of Scotland’s total energy requirements, how they might be reduced, how they might be met, and what part might be played by marine renewables or the blend of renewables resources on offer.

Planning is at its most effective when it establishes a clear, deliverable vision of what can and cannot be developed, so as to allow decisions on individual applications to be taken within this context. Providing certainty and predictability is generally supported by developers, communities, landowners and investors, as it brings them confidence in what will happen to their interests in the future. It should also help to speed up the decision-making process. Given this, we believe that national targets, such as those on the scale of the renewables targets, require a clear national perspective which sets out spatial priorities for renewables development. This will provide the certainty and predictability required by planning authorities, developers, investors and communities. This could have been done through the National Planning Framework, with an evidence base assessing the relative generation potential levels of areas, links to infrastructure and the potential impact of renewables developments visually, environmentally, economically and on communities. This would support planning authorities in producing spatial plans, and guidance to help developers shape their development applications, by providing coherent and cohesive spatial and environmental guidance for them.

We feel this has been a missed opportunity. Each local authority has responsibility for renewable developments in their area but there is no framework identifying priority areas for such renewable developments, where conditions would maximise energy generation whilst minimising adverse impacts. This means that spatial planning of renewable developments is largely left up to local and strategic authorities, with no national coordination to support the achievement of national targets. If guidance was provided as to which general locations should be deemed priority areas for developing renewables, and on the criteria which should be used when making decisions, it would help the planning system to be more proactive and ultimately speedier in dealing with renewables developments, whilst clarifying the role of national policy in local decisions.

Assessment of Capacity
The timescale for meeting the Scottish Government’s ambitious renewable energy targets is short, and to meet them significant new development will be required. The planning implications of the targets are major, with local authorities, agencies, governmental and non-governmental bodies, industrial and community developers and environmental and community interest groups involved at various stages of the process. Given this, it is surprising that little or no consultation appears to have taken place with
the planning profession or planning authorities prior to the adoption of the targets. These targets are already placing significant strain on the Scottish planning system and will no doubt continue to do so over the coming years. It is not clear what evidence was used for setting targets at their current level and timescale and it is a concern that the ability of the planning system in its present form to deal with the necessary pressures may not have been given due consideration when the targets were set.

Consenting Regimes
The Electricity Act consenting process is currently inefficient, leading to multiple consultations and repeated involvement of different agencies. If streamlining is to be done to conserve resources, this process should be a focus of review. While Electricity Act s.36 applications are dealt with by Scottish Ministers, and local authorities publish information about planned and current developments in their areas, there is no centrally co-ordinated programme to ensure that targets are met, nor are there official mechanisms through which authorities can easily co-operate on larger scale developments and infrastructure projects.

Resources
The targets come at a time when planning authorities are losing staff and experience through restructuring in local authorities. The recent Review of the Modernisation of the Planning System, undertaken by Audit Scotland, noted that planning fees are not currently covering the costs of providing the service. This is an issue in planning for, and processing planning applications for, renewables.

Local authorities are already dealing with an increased volume of applications for renewable energy developments. Recent (December 2011) SNH research states that “the wind farm industry and the planning system have now delivered over 5000 MW of wind farm capacity since 2001”. The same report suggests that in December 2011 there were onshore wind projects with approximately 10,000 MW combined capacity at application and pre-application stages. This suggests on one interpretation that twice the number of onshore wind farm applications will have to be processed in the eight years leading to 2020 as were dealt with in the previous ten years. These figures do not take into account other renewable electricity projects, heat and transport fuel generators, nor the energy and transport infrastructure needed to deal with the developments involved and the energy produced. While it is unclear exactly what will be required nationally to meet the renewables targets, it is clear that those local authorities in whose areas most developments are situated will need significant support in order to deal with the increasing workload.

It should also be remembered that renewable energy technologies are constantly evolving. The Routemap requires local authorities to consider “a sufficiently diverse mix of renewables” when preparing Development Plans; to provide “adequate guidance on emerging technologies”; and to prepare spatial frameworks for wind farms. The designation of broad areas of search for wind farm developments is also encouraged. In order to provide this guidance to developers and local communities, it is necessary that planners have significant technical knowledge of renewable energy resources in their
area; how they can be used; and what the specific planning implications of each kind of development might be. Many local authorities are already dealing with a high volume of applications for renewable energy developments and most have not produced a Development Plan since more recent renewable energy targets were set. There is no substantive guidance on the integration of renewable energy resources into these Plans, nor regular updates outlining developments in renewable technologies. Discussions surrounding the fulfilment of targets at a national level note the need for skills and a workforce to research, develop, build and maintain renewable technologies. If the planning system is to be taken sufficiently into account, these new skills, knowledge and staff are also needed in the planning sector in order to keep up with developments.

**HOW CAN NATIONAL PRIORITIES BE RECONCILED WITH LOCAL INTERESTS?**

As planners and local authorities deal with increased applications and considerations, resources are becoming stretched. It is a concern that the consequent problems will lead to a perception that planners are creating barriers to renewable energy development, rather than enabling targets to be met.

A priority from both planning and renewable energy perspectives should be to reduce energy use through improved energy efficiency. Integrating renewable energy policy with other policy areas, such as building regulations and infrastructure planning, could help to improve efficiency and ensure that renewable developments’ grid access is considered from the beginning.

If planners dealing with renewable energy developments are provided with sufficient resources, with updates and guidance on renewable technologies, comparative costs and efficiencies, and spatial and environmental management, they will be able to provide sufficient guidance and information to developers and communities before, and when, planning applications are made. This will also help local authorities (and Planning Aid for Scotland) to support local communities wishing to involve themselves in the location, ownership and management of local renewable energy generators. This could change the relationship which many local communities have with renewable developments, and help achieve the Scottish Government’s community ownership target.

With increased numbers of applications for renewable developments, it is in developers’ and planners’ interests to minimise the time spent on individual applications. This should not be done at the expense of other interested parties, nor of environmental and social considerations. Spending more time in pre-application planning and consultation should help to reduce the overall time developments spend in the planning process. Involving local interest groups in more pre-application consultation exercises, and ensuring that there are opportunities to comment on Supplementary Planning Guidance as well as on Development Plans, could help identify potentially contentious developments before planning applications are made, and help to streamline the process. It is important that these options are considered carefully since the alternative
would seem to be a bypassing of the planning system, something which, it is argued, would be in nobody’s best interest.

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