

CLIMATE CHANGE, ENERGY AND RESOURCES SUB-COMMITTEE

SCOTLAND'S NATIONAL PLANNING FRAMEWORK 4

Cross Sector Energy Discussion, Glasgow, 5th March 2020

Introduction

The Scottish Government is seeking views and ideas from a range of sectors to explore the policy priorities for Scotland's fourth National Planning Framework. HoPS has been asked to present its view at a cross-sector meeting that poses the following question:

Radical energy planning policies in response to the climate emergency – what should we keep, change or add to NPF4?

The opportunity

By and large, the current SPP covers the majority of relevant issues around tackling the climate emergency albeit in somewhat aspirational language. This is understandable given that the purpose of SPP was to inform emerging Development Plans which in turn set out the policies relevant to development proposals. With the intention of it to have the effect of removing policies from the Development Plan there is huge potential for NPF4 to set out a consistent and strategic approach to climate change; including policy around the energy sector. It can set national priorities and targets that achieve local outcomes and assist in the overall goal of net zero.

The current approach to sustainable economic development, to achieve the right development in the right place, not to allow development at any cost, must continue to be a key policy aim. Renewable energy development, to meet climate emergency and achieving a net zero carbon objectives must be delivered to complement other land use planning objectives and not at the expense of them; not least preserving peat land, enhancing biodiversity and maintaining amenity.

NPF4 is a key document for achieving objectives of the Energy Strategy and Energy Efficient Scotland programme. The strategic planning of energy is the best way to bring forward the co-ordinated and integrated change that is necessary. A whole system approach is required; one based on the infrastructure first principle. This change in the approach should bring developers, users, utility providers and owners together from a bottom up/community and area focus as well as the traditional national infrastructure perspective. Understanding options ahead of development allows systems, investments and construction to combine in an improved way. Alignment of policies and expected outcomes set out using stronger, more persuasive, language is required.

Rather than set out aspiration, NPF4 should set the policy framework for positive action.

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The priorities

In attempting to address the question, it difficult to identify *radical* policy change. There is clear direction of travel and an existing policy framework. As set out above, land-use planning, through the National Planning Framework 4 (NPF4), is one opportunity to set the 'rulebook' for Scotland to achieve net-zero and meet our energy needs, including the use of renewable technologies, where individuals, companies and public sector organisations are planning investment and delivering development on the ground. It is a change in emphasis and re-prioritisation of outcomes that is required; embedding climate change into every decision.

Arguably the more challenging changes required fall outwith the planning system. These include education on the need to reduce demand, incentivisation (or penalisation) schemes to change behaviours and influence investment decisions as well as setting standards for energy efficiency. While the respective roles played by Regulation, Building Standards and Planning needs some clarity, there is no doubt that land-use planning can influence behaviour and outcomes where clear direction is provided; predominantly in the form of the stick approach.

Considering three broad areas of interest in heat, electricity and transport it is possible to consider where the focus should lie in terms of influencing national and local priorities.

Heat

From a national infrastructure perspective, support should be given to proposals to replace natural gas with alternative fuels; particularly hydrogen. This seems the most likely alternative without requiring significant change in mindset.

However, the focus of NPF4 should be on encouraging reduction in demand where there is less reliance on national infrastructure and enhancing the opportunities established with the Local Heat and Energy Efficiency Strategy (LHEES) work. This could be achieved through a requirement on Local Authorities to produce **Local Area Energy Plans (with the appropriate financial support) integrated into Local Development Plans.**

Local Area Energy Planning should be considered as a component of infrastructure planning. **An infrastructure first approach allows us to take opportunities presented by 'place'**. This can encompass technologies such a ground source and air source heat pumps, thermal opportunities from mineral workings, renewable sources of heat in rivers, sewers and the ground. The focus need not be on creating integrated energy networks, such as district heating, where lack of density may affect viability. It need not necessarily be connected, since in some communities an off-grid solution might work best. The solution should rather be appropriate to its location.

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Assessment of energy should go beyond consideration of SAP ratings and thermal efficiency of buildings to the contribution made to meeting net zero, and any interim targets, to how they impact on energy infrastructure; particularly for heat/hot water. **Energy Statement Assessment for all new development proposals and changes of use should be required and these should also assess compliance with Local Area Energy Plans.**

While not necessarily for NPF4, the planning system may require changes in regulation in order to facilitate heat networks and technologies. **Consideration should be given to reviewing the current arrangements under the Town and Country Planning (General Permitted Development) (Scotland) Order 1992**, particularly to give local heat networks similar rights as statutory undertakers. This may equally apply to aspects of retro-fitting energy efficiency measures with financial incentives the most likely way to achieving improved efficiency.

Electricity

The electricity network is largely decarbonised nationally. There is an expectation that additional generation will be required to meet increased demand, particularly from decarbonisation of transport. This raises two fundamental points. The first is that ideally, we should seek to challenge this anticipated increase rather than assume an ever upward trajectory of demand, and the second is the need to be more creative in how electricity is distributed and stored. Admittedly, this is largely outwith the remit of planning, but planning has a role to play in influencing it nonetheless.

NPF4 should:

- Look to **support proposals for more local and off-grid generation of electricity** – even if not connected;
- Continue to **support deployment of wave, tidal, solar and other infrastructure but where well located to existing infrastructure** or where these might help fund new critical infrastructure, such as new road/rail crossings and/or flood and coastal erosion defences that assist with climate adaptation;
- Continue to **support re-powering of existing on-shore wind farm sites and new on-shore and off-shore wind developments, where appropriate, but where well located in relation to existing infrastructure** – based on an infrastructure first approach;
- Look to take a **more strategic approach to capacity for on-shore wind, solar and large-scale hydro**, taking into account grid infrastructure and constraints i.e. peatland, ornithology etc. Local Authorities hold much of the evidence that could help provide a national overview and inform realistic targets for further large scale development of this nature;
- Set out **support for new energy storage**, where necessary and appropriate;
- Ensure **Local Area Energy Plans address opportunities and constraints in the electricity network.**

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Again, while not necessarily for NPF4, changes to the current arrangements under the Town and Country Planning (General Permitted Development) (Scotland) Order 1992, may be able to broaden scope for generation and/or storage without the need to submit a planning application; particularly locally.

Transport

De-carbonisation of transport is more challenging. A key way to reduce emissions is to curtail current dependence on travel by private car. The planning system can assist with changing the current car dominant culture and identify transport efficiencies.

NPF4 should:

- Set out a **requirement for Local Transport Plans to be integrated into Local Development Plans** where active travel and public transport opportunities are considered part of the infrastructure of place;
- Require **development to be located in close proximity to existing/new public transport infrastructure and contribute to its success**;
- Reduce parking standards in City Centre, well located development;
- Require provision of **EV charging points/infrastructure** in new development;
- **Support alternative fuels i.e. hydrogen** that can help reduce the dependence on electricity grid.

Other issues

Carbon offsetting

NPF4 should set a policy framework around **carbon offsetting**, whether that relates to planting trees/restoring peatlands/creating of open space, **for all development**.

Circular economy

While not directly energy related, it is apparent that some aspects of the development industry is embracing the circular economy i.e. aggregates are pretty much recycled as standard. However, more is required for industry to properly embrace the circular economy. This can have a positive impact on energy consumption. There is scope for NPF4 to set a policy for **increased use of materials with high/exclusively recycled material content and for buildings to be used more flexibly**. However, there is a need for clarity on which regulation is the best vehicle(s) to achieve this; Building Standards and/or SEPA may be best place to take a greater role.

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Climate Adaptation

NPF4 will need to consider climate adaptation when identifying key infrastructure projects and ensure that it is reflected in policy statements intended to become part of the development plan. Significant long-term planning with the implications of predicted climate change are necessary for all infrastructure proposals. This has implications for the decisions we make on the energy technologies we adopt to produce energy in the future as well as those on distribution and transmission.

Protecting prime agricultural land

The value of our agricultural land is becoming increasingly important to ensure not only food security but achieve wider social and environmental benefits. The need to protect prime agricultural land, or land that will become prime as identified in recent James Hutton Institute mapping, for food production is likely to be more critical. Competing uses of land, for example for afforestation and climate adaptation, makes the case for this protection stronger. This may also have implications for energy production and related development. It would be helpful for NPF4 to define priorities for agricultural land.

Monitoring

Monitoring the impact of the targets and policy requirements on development is necessary to ensure that local implementation is achieving the intended national outcomes. NPF4 should consider how this is done, with monitoring perhaps forming part of the future planning performance framework.

Summary

There is huge potential for NPF4 to set out a consistent and strategic approach to climate change; including policy around the energy sector.

The strategic planning of energy is the best way to bring forward the co-ordinated and integrated change that is necessary. A whole system approach is required; one based on the infrastructure first principle.

A well-established policy context exists, it is more a change in emphasis and re-prioritisation of outcomes that is required; embedding climate change into every decision. Aligning policies and the expected outcomes within planning policy that using stronger language is what is required.

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Key NPF4 policies should include:

- Requirement to produce Local Area Energy Plans that have a place centred infrastructure approach;
- Requirement to produce Local Transport Plans that have a place centred infrastructure approach;
- Support for local grid/off-grid solutions for both electricity and heat to reduce burden on national infrastructure;
- Continued support for new renewable energy proposals where appropriate;
- Support for the re-powering of existing sites, again where appropriate;
- Requirement for Energy Statement Assessments for new development that link to Local Area Energy Plans;
- Requirement for provision of EV charging infrastructure in new developments;
- Setting out support for energy storage and requirements in new developments i.e. required to be included in proposals and set out within the Energy Statement

Not so much radical but connected – not just to other regulation but to place.

D. Mudie, Chair

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