

## **DRAFT ENERGY STRATEGY AND JUST TRANSITION PLAN CONSULTATION**

**Tuesday 9<sup>th</sup> May 2023**

### **1. What are your views on the vision set out for 2030 and 2045? Are there any changes you think should be made?**

There is broad support for the vision generally. It is imperative that we transition as quickly as possible to a low carbon future and of course to do so in a way in which all of society can benefit from.

The targets are ambitious and are yet to be tested. The mechanisms available to achieve them not established. And, the effects on communities and the environment yet to be appreciated.

Heads of Planning Scotland has been calling for a more holistic approach to identifying opportunities and threats to our energy system at a local level through a requirement for local authorities to produce Energy Plans to sit alongside the Development Plan. We see the statutory requirement to produce an LHEES and delivery plan as a step in the right direction but without more integrated planning with industry and other partners, opportunities for regional scale transformational change will be lost.

The link between energy production, transmission and distribution and the land use planning system is an important one. While many aspects critical to change are reserved to Westminster, land use planning is not. This can effect and/or demand change through a strong policy approach.

The level and speed of decarbonisation needs to be informed by the evidence base developed through such an approach, not just by setting targets. Collection of data feeding up from local to national level and vice versus would be beneficial.

Land use planning, with the correct policy approach, would deliver greater societal benefit – through a clear requirement for shared ownership and/or other initiatives such share schemes, power purchase agreements and establishment of strategic funds that could build and distribute wealth more widely. This could deliver the just and fair transition outcomes that the policy seeks. It could be seen to be compatible with community wealth building goals and show that land use planning can contribute positively to that agenda.

From an environmental perspective, achieving such a significant increase in renewables infrastructure will be challenging without substantial impact. National Planning Policy does seek to manage this through protection of national designations, species and our important resources such as peat. However, there is limited protection for locally important features.

Removal of the ‘Spatial Framework for Wind’ that was previously required under Scottish Planning Policy (but not under NPF4) remains an area of concern for local authorities in protecting locally important areas.

Many authorities were considering these in a wider context, not to restrict development but to guide it to the least sensitive areas. Reintroducing an approach such as this would not only help to give confidence to communities that their interests with regard to landscape and visual aspects were being considered but it would provide greater confidence to developers and also help inform the debate around where best technology can be developed to meet our intended target.

The absence of this guiding framework, will most likely result in more time and effort being required in the processing and determining of applications, and lead to an increase in planning appeals and delays in meeting targets.

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This type of exercise, extended to other technologies as well as energy transmission and distribution networks, would result in a more planned approach to energy that could provide greater certainty to industry, improved democratic accountability for our communities and more streamlined and quicker decision making. This could be supported further through changes to the current arrangements around consenting; with more applications being decided under the Town and Country Planning Acts rather than Electricity Act.

### **2. What more can be done to deliver benefits from the transition to net zero for households and businesses across Scotland?**

There is a focus on community renewables in the strategy, but not on household renewables. This should be encouraged and is complementary to measures such as households' adoption of heat pumps and EV technology affordably.

There is limited reference in the Strategy to LHEES as a delivery mechanism and a means of coordinating strategic investment. This is disappointing given the role of local authorities as a key partner in producing strategy and delivery plans and the statutory role status of these documents.

As set out above LHEES, as an overarching strategic investment framework, should provide a vehicle to engage with communities to develop a pipeline of investible projects tied to wider consideration of other energy aspects, grid capacity and funding and investment both near to medium term and longer that will require collaboration and investment planning aligned to priorities of the Distribution Network Operators. This would effectively create an Energy Plan.

Potential for greater grant funding, not only to the elderly or less affluent, and/or reducing the cost of loans and/or period of payment.

### **3. How can we ensure our approach to supporting community energy is inclusive and that the benefits flow to communities across Scotland?**

While there is clear intention for the policy around community benefits associated with energy development to be updated, it is considered that there is a need for a more holistic approach to securing benefits for our communities.

While there are many different examples of how some communities have secured benefits, this is not necessarily leading to a transformational change with regard to energy wealth within our communities. Fuel poverty in areas abundant with cost effective electricity generation still exists.

Discounts to energy bills is not sustainable. The ability for every member of a community to benefit must look beyond the traditional per MW agreement and/or ownership model where it may be that individual cannot afford to invest.

Community benefit and benefit from renewable energy development generally needs to be considered in the context of community wealth building. How can development support the communities to support themselves?

What is required is a strong policy approach. The land use system could be key to unlocking community ownership, power purchase agreements and other such initiatives. It could also secure funds for investing in LHEES type strategies or providing additional financial help to individuals or whole communities to develop their own projects.

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NPF4 contains a policy of tentative support for development that addresses community wealth building strategies and this could be the level in which to insist on meaningful community benefit.

This requirement should also be reflected within any negotiated sector deal.

### **4. What barriers, if any, do you/your organisation experience in accessing finance to deliver net zero compatible investments?**

No comment

### **5. What barriers, if any, can you foresee that would prevent you/your business/organisation from making the changes set out in this Strategy?**

As an organisation that represents local authority Heads of Planning in Scotland, the ability of local authorities to influence the strategic aims are impacted by a limited resource in terms of people, expertise in respect of people with the required skill and the funding required to help drive the change necessary, including through projects that lead by example.

### **6. Where do you see the greatest market and supply chain opportunities from the energy transition, both domestically and on an international scale, and how can the Scottish Government best support these?**

No comment

### **7. What more can be done to support the development of sustainable, high quality and local job opportunities across the breadth of Scotland as part of the energy transition?**

Working with universities and colleges to identify and deliver appropriate courses across the country to ensure a supply of newly skilled and trained workers able to fill green energy jobs and also those key roles that support the development industry required to implement the change.

### **8. What further advice or support is required to help individuals of all ages and, in particular, individuals who are currently under-represented in the industry enter into or progress in green energy jobs?**

No comment.

### **9. Should the Scottish Government set an increased ambition for offshore wind deployment in Scotland by 2030? If so, what level should the ambition be set at? Please explain your views.**

There should be an increased ambition for offshore wind. Without a route to market it is difficult to predict what that level should be set at.

This additional target should be considered as an opportunity for Scotland to take a share of domestic energy expenditure and support community wealth building.

Any increased ambition should fully recognise and mitigate the impacts to habitats and species whether formally designated and legally protected or not. The ability to connect to the grid may be a limiting factor; particularly where there are socio and environmental conflicts on-shore.

Limitations on grid may provide greater ability for 'private wire' arrangements to support specific industry and/or energy production i.e. hydrogen.

### **10. Should the Scottish Government set an ambition for offshore wind deployment in Scotland by 2045? If so, what level should the ambition be set at?**

Yes. As above.

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### **11. Should the Scottish Government set an ambition for marine energy and, if so, what would be an appropriate ambition?**

There should be an increased ambition for marine energy. This should not be limited to wave and tidal albeit that these sectors are important.

Given that the majority of heat demand in buildings are within in settlements on or near marine/tidal water resources, there may be untapped potential to utilise heat from marine (highly predicable circa 8-9oC) and other large water bodies.

### **12. What should be the priority actions for the Scottish Government and its agencies to build on the achievements to date of Scotland's wave and tidal energy sector?**

No comment.

### **13. Do you agree the Scottish Government should set an ambition for solar deployment in Scotland? If so, what form should the ambition take, and what level should it be set at? Please explain your views.**

Yes. There should be an increased ambition for solar in Scotland.

The level should be informed through further study to identify the best areas in which it can be deployed with minimal impact on the environment, communities and competing land use. This suggests a need for a 'Spatial Framework for Solar' that can then form part of an Energy Plan. Consideration of technical suitability, constraints and integration of PV in whole energy systems planning should be considered and evidenced to create policy targets which reflect local circumstance.

Can the Scottish Government support work to map the opportunity down to a local authority level?

Guidance on solar generally would be helpful. Further guidance on the role of solar panels on historic buildings and buildings within conservation areas is also required. As historic buildings often have limited options for internal wall insulation etc, more emphasis is potentially placed on the role of solar panels for these properties and therefore clear guidance on what is/is not acceptable is required.

### **14. In line with the growth ambitions set out in this Strategy, how can all the renewable energy sectors above maximise the economic and social benefits flowing to local communities?**

See Q3. Sector deal type agreements may assist, as would discussion through the processing of development applications/consents but ultimately this will only happen where there is a strong policy requirement.

### **15. Our ambition for at least 5 GW of hydrogen production by 2030 and 25 GW by 2045 in Scotland demonstrates the potential for this market. Given the rapid evolution of this sector, what steps should be taken to maximise delivery of this ambition?**

This seems a low threshold and the £100M looks to be a low investment for this type of transition. While hydrogen is not without its issues, this is a gamechanger for decarbonising transport. It can, if developed at pace and in capacity become very lucrative to the Scottish economy by way of export. More investment in regional hubs may expedite this ambition.

The HoPS membership had mixed views on whether hydrogen should be used for heat, largely reflecting the urban/rural representation.

It would be hugely beneficial for those currently reliant on oil heating and would be an easy transition for many currently on the gas mains. This should not ignore the need for energy efficiency, but it could

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offer cost effective heating for many pre-war properties that will not be able to meet the level of home insulation required for effective adoption of ASHP/GSHP and/or district heating.

It is unlikely that targets for adoption of ASHP/GSHP technologies will be met given supply constraint.

### **16. What further government action is needed to drive the pace of renewable hydrogen development in Scotland?**

Increasing the extent of offshore wind deployment would assist with providing a route to market at least until such time as grid capacity constraint is overcome.

### **17. Do you think there are any actions required from Scottish Government to support or steer the appropriate development of bioenergy?**

Guidance on what forms this takes, where it may be appropriately deployed and the impacts and effects on other land uses that may result should be produced.

### **18. What are the key areas for consideration that the Scottish Government should take into account in the development of a Bioenergy Action Plan?**

Compatibility with other land uses and food security.

### **19. How can we identify and sustainably secure the materials required to build the necessary infrastructure to deliver the energy strategy?**

No comment.

### **20. Should a rigorous Climate Compatibility Checkpoint (CCC) test be used as part of the process to determine whether or not to allow new oil and gas production?**

If we are to realise the Scottish Government's ambitions by 2045, we need to shift away from reliance on oil and gas. However, upscaling the necessary renewable and low carbon energy infrastructure will take time and in the interim oil and gas will still continue to play a part of the energy solution. Until then, it is important to ensure their need is rigorously tested.

### **21. If you do think a CCC test should be applied to new production, should that test be applied both to exploration and to fields already consented but not yet in production, as proposed in the strategy?**

The policy landscape may have changed considerably since consents were granted. It is important to review those consents to ensure they are compatible with current national vision and policies and that they align with the global goals of the Paris Agreement.

### **22. If you do not think a CCC test should be applied to new production, is this because your view is that:**

No comment.

### **23. If there is to be a rigorous CCC test, what criteria would you use within such a test? In particular, in the context of understanding the impact of oil and gas production in the Scottish North Sea specifically on the global goals of the Paris Agreement, should a CCC test reflect:**

No comment.

### **24. As part of decisions on any new production, do you think that an assessment should be made on whether a project demonstrates clear economic and social benefit to Scotland? If so, how should economic and social benefit be determined?**

This should also refer to 'environmental'.

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### **25. Should there be a presumption against new exploration for oil and gas?**

As an apolitical organisation HoPS has no particular opinion whether to support or not continued oil and gas exploration. To meet our climate aspirations this issue needs careful consideration. There is concern, and it may need to be well justified, that prolonging oil and gas exploration may only delay progress in transitioning to alternative fuels.

### **26. If you do think there should be a presumption against new exploration, are there any exceptional circumstances under which you consider that exploration could be permitted?**

No comment.

### **27. What further government action is needed to drive energy efficiency and zero emissions heat deployment across Scotland?**

The strategy needs a more coordinated approach to linking energy efficiency and heat to the wider energy system; a more holistic approach as set out in response to Q2.

### **28. What changes to the energy system, if any, will be required to decarbonise transport?**

As set out in the Draft Strategy significant upscaling of hydrogen production will be required. There will need to be significant, rapid upgrades to the grid distribution infrastructure to enable both significant scale-up of EV and heat electrification technologies to be progressed in parallel.

### **29. If further investment in the energy system is required to make the changes needed to support decarbonising the transport system in Scotland, how should this be paid for?**

No comment.

### **30. What can the Scottish Government do to increase the sustainable domestic production and use of low carbon fuels across all modes of transport?**

On the production side, continue to support initiatives for transition to EV and/or hydrogen and encourage investment through publication of policy and strategy.

To encourage use, offer funding/incentives for uptake and disincentives for not shifting. Utilise grant funding to public organisations as a lever for change and use influence to achieve bulk buying of low emission vehicles across the public sector.

Influencing the demand side might create the right conditions for investment in production.

### **31. What changes, if any, do you think should be made to the current regulations and processes to help make it easier for organisations to install charging infrastructure and hydrogen/low carbon fuel refuelling infrastructure?**

Heads of Planning Scotland has responded to recent consultations on the Town and Country Planning (General Permitted Development) (Scotland) Order 1992.

It does not follow that the planning system is a significant barrier to deployment, merely it seeks to ensure that the development is located appropriately when permission is required.

### **32. What action can the Scottish Government take to ensure that the transition to a net zero transport system supports those least able to pay?**

Investing and supporting affordable and reliable public transportation services and good active travel infrastructure.

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Deliver on NPF4 policy commitments – Policy 13: Sustainable Transport and Policy 15: Local Living and 20-minute neighbourhoods – which should result in people living within communities where the majority of their everyday needs can be met locally without the need to travel by car. Arguably a more forceful policy approach might do that.

For those unavoidable journeys by car, there should be some provision for those on low income to access affordable charging tariffs as they will be least likely to be able to access discounted home charging provision.

### **33. What role, if any, is there for communities and community energy in contributing to the delivery of the transport transition to net zero and what action can the Scottish Government take to support this activity?**

Financial support to communities to support the development of low/zero carbon transport hubs in their communities, particularly in rural areas, would assist. There is potential for these hubs to support other initiatives at the same time e.g. tourism/hospitality.

This could be the type of ‘benefit’ that can be identified as part of a community wealth building strategy.

### **34. Electric vehicle batteries typically still have around 80% of their capacity when they need replacing and can be used for other applications, for example as a clean alternative to diesel generators. What, if anything, could be done to increase the reuse of these batteries in the energy system?**

There may be potential to re-use EV batteries for home/neighbourhood energy storage and therefore studies should be taken to identify the capacity within the distribution network to accommodate home/neighbourhood solutions for energy storage with a mind to establish initiatives for deployment.

### **35. What are the key actions you would like to see the Scottish Government take in the next 5 years to support the agricultural sector to decarbonise energy use?**

There is potential for future Scottish Govt Land Use Strategies to support long term land use planning with the aim of multiple benefits across environmental, economic and social themes.

Supporting farmers to diversify and deliver multi-benefit nature-based solutions; continuing to protect prime agricultural land to ensure sustainable food supply and food security; protecting and restoring our soils, particularly carbon rich soils; provide support and guidance regarding the provision of low carbon/net zero and renewables solutions on farms – including to support local authorities in their decision-making where tensions exist between the siting and design of these pieces of infrastructure, and their potential impacts on the landscapes and rural settings in which they are sited and managing public opinion.

Support agriculture to manage its own emissions on farm where possible.

### **36. What are the key actions you would like to see the Scottish Government take in the next 5 years to support the development of CCUS in Scotland?**

Local authorities will want to know, not only which industries/sites will be prioritised but also what the additional land take associated with such proposal might be.

This information will be critical to support local authorities in developing their next development plans.

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### **37. How can the Scottish Government and industry best work together to remove emissions from industry in Scotland?**

No comment.

### **38. What are the opportunities and challenges to CCUS deployment in Scotland?**

No comment.

### **39. Given Scotland's key CCUS resources, Scotland has the potential to work towards being at the centre of a European hub for the importation and storage of CO<sub>2</sub> from Europe. What are your views on this?**

While not directly relevant to the work of HOPS, in the spirit of the discussion on community wealth building should Scotland not be looking to establish a national/regional fund, much like the Norwegian Oil Fund, a Scottish Carbon Capture Fund? This approach would potentially be applicable to all types of energy production also.

### **40. What additional action could the Scottish Government or UK Government take to support security of supply in a net zero energy system?**

More actions to support the holistic approach aspiration.

The link between energy demand reduction and storage to manage and minimise supply challenges is highlighted and needs some clear decisions. This may have a significant bearing on the decision to proceed with a new wave of pumped hydro projects.

### **41. What other actions should the Scottish Government (or others) undertake to ensure our energy system is resilient to the impacts of climate change?**

Ensure that only the right development is proposed in the right location capable of addressing climate adaptation.

This is itself may create opportunities for future energy production i.e. tidal/wave infrastructure, storm water capture and/or blue/green infrastructure.

Supporting self-reliant community infrastructure may also assist – being capable of being off-grid at least some of the time.

### **42. Are there any changes you would make to the approach set out in this route map?**

See above responses.

### **43. What, if any, additional action could be taken to deliver the vision and ensure Scotland captures maximum social, economic and environmental benefits from the transition?**

See response to Q2 and Q3.

### **44. Could any of the proposals set out in this strategy unfairly discriminate against any person in Scotland who shares a protected characteristic? These include: age, disability, sex, gender reassignment, pregnancy and maternity, race, sexual orientation, religion or belief.**

No comment.

### **45. Could any of the proposals set out in this strategy have an adverse impact on children's rights and wellbeing?**

No comment.



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**46. Is there any further action that we, or other organisations (please specify), can take to protect those on lower incomes or at risk of fuel poverty from any negative cost impact as a result of the net zero transition?**

No comment.

**47. Is there further action we can take to ensure the strategy best supports the development of more opportunities for young people?**

No comment.

**48. What are your views on the approach we have set out to monitor and evaluate the Energy Strategy and Just Transition Plan?**

No comment.

**49. What are your views on the draft Just Transition outcomes for the Energy Strategy and Just Transition Plan?**

No comment.

**50. Do you have any views on appropriate indicators and relevant data sources to measure progress towards, and success of, these outcomes?**

No comment.

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**About you**

**Are you responding as an individual or an organisation?**

Organisation

**What is your organisation?**

Heads of Planning Scotland (HOPS)

**The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:**

Publish response only (without name)

**We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?**

Yes