

Response ID ANON-J2XA-WPXU-9

Submitted to **Strategic Infrastructure (Transport and Utilities) Sector Plan**
Submitted on **2019-02-15 15:07:51**

Introduction

1 What is your name?

Name (optional):

Robbie Calvert, Policy and Practice Officer at RTPI Scotland

2 What is your email address?

Email (optional):

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3 What is your interest in the Strategic Infrastructure Sector Plan?

Answer:

The planning and delivery of strategic infrastructure is a core function of the planning systems. As statutory consultees and collaborative partners, SEPA are key stakeholders in the process by which we shape place. 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 2300 members in Scotland and a worldwide membership of over 25,000.

Strategic Infrastructure (Transport and Utilities) Sector Plan

4 Do you agree with the proposed scope of the Strategic Infrastructure (Transport and Utilities) Sector Plan?

Strongly agree

Do you have any comments on the proposed scope of the Strategic Infrastructure (Transport and Utilities) Sector Plan? :

5 Do think the proposed vision for the Strategic Infrastructure (Transport and Utilities) Sector Plan sets the right level of ambition for the sector?

Strongly agree

Is there anything that you think should be included or changed to improve this vision? :

6 Does Section 3 broadly set out the context for the Strategic Infrastructure (Transport and Utilities) sector in Scotland?

Yes

Is there anything that is missing, or which should be changed? :

RTPI Scotland agrees that future strategic investments should be guided by advice from the newly-formed Scottish Infrastructure Commission. RTPI Scotland would support explicit mention of future guidance from the National Planning Framework (NPF), which is the spatial expression of the Scottish Government's Economic Strategy including national infrastructure needs and delivery. This can help integrate the complex decision-making on infrastructure described in the section from "a mixture of devolved/reserved powers and public/private ownership, as well as several funding and finance sources."

There is an opportunity to align investment decisions with the National Planning Framework in the future. In particular, the opportunity to integrate Regional Economic Partnerships, City Region Deals and Regional Transport Partnerships with strategic planning is critical to better co-ordinate transport and infrastructure planning. The current reviews of the National Transport Strategy, and the energy strategies offer further opportunity to address sectoral and policy silos, whilst there is a need to address the complementarity of the National Marine Plan and Land Use Strategy.

RTPI Scotland would encourage SEPA to engage early and proactively with stakeholders to assess opportunities, constraints and then agree priorities and resourcing for development.

7 Have we identified the main environmental impacts of the sector in Figure 6?

Strongly agree

Are there any other impacts that concern you which are not included? :

8 Have we described the regulation of the sector correctly?

Yes

Are there any aspects that we have missed? :

9 Have we identified the main partners and influences for the sector in Figure 8?

No

Who else do you think should be included? :

Department of Environmental Appeals (DPEA), the Royal Town Planning Institute (RTPI), Regional Economic Partnerships, and City – Region Deals boards.

10 Does Figure 9 summarise the key issues which may impede compliance or uptake of beyond-compliance opportunities within the sector?

Yes

What else do you think should be included? :

Poor engagement at the pre-application stage

Strategic Infrastructure (Transport and Utilities) Sector Plan

11 Does Section 5 identify the correct compliance issues for the sector?

Agree

If not, what issues have we not identified? :

The key issues contributing to non-compliance in areas where we have a statutory role but no direct regulatory role could include SUDS schemes not being built or not being in accordance with approved drawings.

12 Have we identified the right actions to solve compliance issues in the sector?

Agree

If not, what actions to do you think need to be taken to improve compliance?:

There are issues around responsibilities and cross overs when it comes to compliance. It is important that local authority planners work together with SEPA in ensuring that developments are in accordance with a set of compliance requirements. Whilst there should be a clear line of specific responsibilities and compliance supervision, it is crucial to keep each other up to date as for example compliances on sustainable drainage systems may be a SEPA and planning condition issue.

13 Are there specific areas of non-compliance that are likely to respond better to the use of our enforcement measures than others?

Not sure

If yes, what are they? :

14 The proposed aspirations identified in the Water/Energy/Materials/Habitat sections are our initial thoughts for how we could help the sector to go further. Do you think we have identified the right aspirations?

Agree

What aspirations do you think we should have? :

The inclusion of specific reference to communities, as a key stakeholder, in the energy section could add more emphasis on the inclusive partnership approach.

15 Do you think the potential actions under 'What actions are we going to take?' will help us achieve the plan's aspirations and outcomes?

Agree

If not, what actions should we include? :

RTPI Scotland welcomes that SEPA seeks to explore the potential for a regulatory hub as well as maximising cross-sector working, so that a variety of parties including planners have opportunities to discuss implementation policies that are mutually consistent, considered, robust, and contribute to future economic and environmental success.

Regarding action D 'Information', SEPA mentions a few institutes for which Continuing Professional Development may be required. RTPI is keen to be also included in the list as many planners would benefit from learning and exchanging ideas with SEPA on a variety of topics.

16 Do you agree with the proposed outcomes for the sector plan?

Strongly agree

What other outcomes do you think we should consider? :

17 Is there anything else you wish to add?

No

Please provide your thoughts here: