



**RTPI**

mediation of space · making of place

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30<sup>th</sup> October 2008

Dear Sir or Madam

### **Adapting Our Ways: Managing Scotland's Climate Risk**

The Royal Town Planning Institute (RTPI) welcomes the opportunity to respond to this consultation which discusses the need for sustainable approaches to climate adaptation.

The RTPI is the UK body chartered to represent the planning profession and offers these comments from the point of view of a diverse and politically-neutral professional body committed to supporting devolved government in Scotland. The Institute has approximately 2100 members in Scotland, working across all sectors of central government, local government, government agencies, the voluntary sector, private consultancy, the development industry and academia.

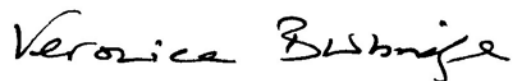
Since devolution, the Institute has empowered its RTPI in Scotland Office, together with its Scottish Executive Committee, with the responsibility for working with government and public bodies generally for the improvement of the planning system in Scotland. This is in accordance with its charter obligation to work for the public interest.

Annex 1 to this document provides a detailed response to the questions posed in the consultation document. In general, the Institute recognises the complexity of the issues to be addressed. As noted in the Green Paper 'Adapting to Climate Change in Europe' we consider that the spatial planning system has a key role to play in linking together vulnerability and risk assessment with adaptive capacity and adaptation responses and in identifying policy options and cost-efficient strategies. This will be particularly useful at the National Planning Framework and strategic development planning levels.

We see planning policies and guidance as offering significant benefits to the adaptation process with plans and related documents tackling the fundamental human activities which are contributing to climate change. We look forward to seeing some real potential for planners and plan-making in Scotland, in 2009 and beyond, to grapple with the causes and effects of climate change in a meaningful and creative way. This should start with the National Planning Framework 2, and be rolled out through Strategic and Local Development Plans in the next few years. The Institute notes the need for information, advice and training for all those involved and particularly for built environment professionals and for elected representatives. The RTPi in Scotland is very willing to be involved in such initiatives and will be holding its annual conference on 13th November on the issue of 'Spatial Implications of Climate Change'.

The Institute trusts that these comments are of assistance and has no objection to its comments being made available to the public in the usual way. Should you wish any clarification or further assistance, please do not hesitate to contact me at our Edinburgh office: 57 Melville Street Edinburgh, EH3 7HL phone: 0131 226 1959, or email: [scotland@rtpi.org.uk](mailto:scotland@rtpi.org.uk)

Yours faithfully

A handwritten signature in black ink, appearing to read 'Veronica B. B. B.' with a stylized flourish at the end.

National Director

## Annex 1

### **Response by the Royal Town Planning Institute In Scotland To The Questions Raised in the Scottish Government Consultation On Adapting Our Ways: Managing Scotland's Climate Risk**

#### **1 Do you think what we have outlined in paragraph 4.10 constitutes the correct understanding of climate adaptation?**

1. In general, the definition covers key elements building on the IPCC definition, it may be of assistance to refer to the scale and risk of such changes, to adopt an approach based on the precautionary principle and to address the spatial implications of economic, environmental and social change.

#### **Please provide any additional comment. (paragraph 4.10)**

2. The National Planning Framework 2 is well into the consultation process at present, with a timeframe running until 2030. It will need to take into account any revised estimates published early in 2009. Without effective preparation and planning there will also be significantly increased *environmental* costs to add to those social and economic ones identified in para 4.10.

#### **2 Do you think what we have outlined in paragraph 4.11 constitutes the correct understanding of a well-adapting Scotland?**

3. The Institute considers that many of the key constituents are covered. It is suggested that a well-adapted Scotland might also give greater emphasis to addressing social inequalities. It is expected that Government will play a lead role in supporting the necessary research, monitoring and innovative technological developments.

3

#### **3 Do you think we have identified the correct strategic principles for promoting a sustainable approach to climate adaptation?**

4. The Institute supports the principles identified but would suggest the inclusion of the precautionary principle.

#### **If not, do you think any of the existing strategic principles should be removed or clarified?**

5. Bullet point 2 might refer to 'an appropriate cycle of review and action'; bullet point 3 might benefit from the inclusion of some examples; and bullet point 4 might refer to the needs to examine the spatial implications and to integrate policies and actions through the development planning processes.

#### **If not, do you think any additional strategic principles should be added, such as the four As: Awareness + Avoidance + Alleviation + Assistance? (paragraph 5.6)**

6. In addition, it may be useful to emphasis the close working between adaptation and mitigation measures. Perhaps some space could also be found for the 4 Rs – Reduce, Re-use, Recycle and Rethink. At some point there may be a need to recognise that economic growth could be, in the case of climate change, part of the problem rather than the solution: such arguments will need to be teased out early in the process if we are to plan successfully to meet emission and other targets.

**4 Do you think we have identified the correct strategic priority actions for Government to promote a sustainable approach to climate adaptation?**

7. In general, the Institute supports the principles identified. The principles identified might usefully be organised under the four As (Awareness + Avoidance + Alleviation + Assistance with a clearer explanation of the meaning of 'resilience'. This would provide closer links with the work of Scottish Resilience. The Institute supports a leadership role for both the Scottish Government and local government through the National Planning Framework, Strategic and Local Development Plans. It is considered that Strategic Environmental Assessment will be an important tool in assessing impacts and evaluating adaptation strategies. The Institute supports the inclusion of the precautionary principle as a guide to decision making in the face of prevailing uncertainty and as noted above, considers that this principle should underpin the adaptation strategy.

**If not, do you think any of the existing strategic priority actions should be removed or clarified?**

8. The target groups in bullet 6 might be more closely identified and consideration given to the particular needs of vulnerable groups, health inequalities and environmental justice
9. One of the important elements of such capacity will be ensuring there is sufficient support for the development of skilled professionals across planning and related fields to construct effective plans and strategies to combat climate change and its impacts.
10. It would also make sense to plan for infrastructure with adaptive capacity.

4

**If not, do you think any additional strategic priority actions should be added? (paragraph 5.7)**

11. Early action to define risks to be addressed by the framework would be useful. The development of scenarios and likely impacts across all sectors would provide a useful starting point. These strategic priorities for action could be linked to guidance on the statutory duty placed on development plans to contribute to sustainable development.

**5 Do you think these are the most pressing challenges for organisations responding to critical weather events?**

12. It is suggested that further guidance might be learned from the Pitt Review of Lessons Learned from the 2007 Floods in England.

**Please provide any additional comment. (paragraph 6.4)**

13. Challenges are both short and long-term. Short-term include loss of life and limb, business disruption, loss of supplies and markets, and unstable pricing of energy, raw materials, and goods. Significant challenge also exist in the long-term to prepare medium and long-term development plans to address the management of change.

**6 What do you think are the most pressing challenges for organisations planning for critical weather events? (paragraph 6.4)**

14. Pressing challenges for organisations include effective integration of sectors and the need to think beyond the short-term reactive: in both of these planners and the planning system have important roles to play.

**7 Do you think we have identified the right role for the Scottish Government in supporting climate adaptation in Scotland?**

15. The Institute supports the strategic role identified for Scottish Government and for the need to integrate actions across the sectors identified.

**If not, what would you add to, remove from or clarify about this role? (paragraph 6.8)**

16. The Institute suggests that greater emphasis might be given to the role of the National Planning Framework, strategic development plans and local development plans as effective means of integrating these actions

**8 Which key audience groups/ organisations/ bodies do you think the Scottish Government should be communicating with about climate adaptation? (paragraph 6.19)**

17. The Institute supports the need to communicate with all Scottish sectors, appropriate organisations and bodies at the UK, European and international levels. We consider that there is a particular need to address skills development across professional groups. This is a complex and technical field. Scottish Government together with CoSLA and the Improvement Service, Universities and professional institutions have an important role to play in providing information, advice and training for all those involved. The RTPI in Scotland is very willing to be involved in such initiatives and will be holding its annual conference on 13th November on the issue of 'Spatial Implications of Climate Change'.