



RTPI

mediation of space · making of place

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Mr Jody Fleck
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The Scottish Government
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Edinburgh
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Email to: cca@scotland.gsi.gov.uk .

17th July 2009

Dear Mr Fleck

Preparing for a Changing Climate: second consultation to inform Scotland's Climate Change Adaptation Framework

Thank you for the opportunity to respond to the consultation on 'Preparing for a Climate Change' which seeks views on a Framework through which the Scottish Government will seek to build resilience to the unavoidable consequences of climate change.

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.

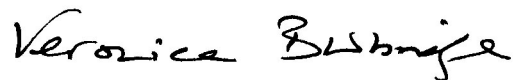
Since devolution, the Institute has empowered its RTPI in Scotland Office, together with its Scottish Executive Committee to take the responsibility for working with government and public bodies generally for the improvement of the planning system in Scotland. This is in accordance with the Institute's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

Our responses to the questions in the consultation paper are set out in Annex 1 to this letter. In summary, the Institute supports the high priority given by Scottish Government to actions for climate change adaptation and would like to encourage greater emphasis on the role of spatial

planning in co-ordinating the Government's response to these issues through the National Planning Framework, Scottish Planning Policy, and through strategic and local development plans. The Institute is developing its own action programme in response to climate change and we would welcome the opportunity to work with Scottish Government and to share progress and outcomes from our action programme, details of which are attached at Annex 2.

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

Yours sincerely

A handwritten signature in black ink that reads "Veronica Burbridge". The signature is written in a cursive style with a large initial 'V' and a stylized 'B'.

Veronica Burbridge
National Director

Response by the RTPI in Scotland to questions raised in the consultation paper 'Preparing for a Changing Climate: second consultation to inform Scotland's Climate Change Adaptation Framework'

Question 1: The Government wishes to improve understanding of the consequences of a changing climate.

1a Do you think the six actions identified in section 2.6 are the most appropriate actions to achieve this?

1. The Institute agrees with the importance of the six actions identified in section 2.6, however, we consider that to be effective these actions must be translated first into relevant climate change scenarios, and then into spatial action plans. The timing for this work is such that, with the introduction in 2009 of the Planning (etc) Act, the first round of new Development Plans, as well as Development Management Policies, must reflect the urgent necessity to plan for climate change. Issues such as the avoidance of building on land liable to flooding and coastal defence works, as mentioned in the Ministerial Foreword to the consultation paper, will need to be considered within a spatial and plan-led system. Spatial implications should be incorporated into each of these actions and the research results regarding risks and opportunities should be available in a format suitable for early input into strategic environmental assessments of policies and plans at all levels.

1b Are there additional actions that you think are necessary and if so, what are they? (Please identify up to three)

2. The Institute considers that effective spatial planning for climate change is vital, at all levels from the National Planning Framework 3 to Supplementary Planning Guidance.
3. There is a strong case for strengthening the requirement to ensure that decisions concerning the location, layout and design of developments fully take into account the need to consider all climate change adaptation factors. This should be reflected in the new consolidated SPP and in associated advice and guidance.

Question 2: The Government wishes to improve the capacity of individuals and organisations to adapt well to a changing climate.

2a Do you think the two actions identified in section 2.7 are the most appropriate actions to achieve this?

4. The Institute agrees with the need to provide decision-makers with appropriate decision support tools and training. Ensuring that all built environment professionals are aware of the practical measures to adapt to climate change, and the appropriate responses, is essential. There is a need for a well focused programme of training, research and knowledge transfer and demonstration projects.
5. We consider that there are some omissions in the detailed listing of actions in Annex A and that more emphasis should be given to the needs of strategic and local development plans and to the information and assessments in support of strategic environmental assessments. It is suggested that the action to 'integrate climate change adaptation into Government economic policy' should read 'to integrate climate change adaptation into spatial plans.' This would give clearer recognition to the integrating role played by NPF2, the early and simultaneous development of NPF3, strategic and local development plans. Actions relating to the Government's economic policy could be developed further under a

separate heading. Action 27 might also include the integration of climate change adaptation into community planning.

6. We consider that there must be effective roll-out of climate change dimensions within the spatial planning framework: this will require leadership and guidance. The RTPI has recently published 'Our Seven Commitments: planning to live with climate change.' These commitments and our associated action plan are available at: <http://www.rtpi.org.uk/> and are discussed further below. (See Annex 2).

2b Are there additional actions that you think are necessary and if so, what are they? (Please identify up to three)

7. See above and below.

Question 3: The Scottish Climate Change Impact Partnership (SCCIP) website provides a number of tools to help increase the resilience of organisations and infrastructure in Scotland to the impacts of a changing climate.

3a Have you used the website or contacted SCCIP directly for advice or help?

8. Yes, we have used the web-site. There is much there that would be helpful for RTPI Members. More work might be undertaken to provide guidance relating to the development of strategic and local development plans. The Institute would be happy to be involved in such activity, which should *inter alia* probably involve SCCIP, SNIFFER, COSLA and the Scottish Government Directorates of Built Environment and Rural Affairs

3b If yes, which of the following four services did you use and how do you think the service might be improved:

- i) Data on climate trends and impacts in Scotland.
How do you think this service might be improved?
9. The information should be updated to reflect the 2009 UK Climate Change scenarios. It would be particularly helpful if, from the NPF down, guidance could be provided as to both mitigation and adaptation by spatial planning, based on a 4 degrees C adaptation requirement, and mitigation measures to attain a maximum rise of 2 degrees C. Work should begin immediately upon NPF3 on that basis.
- ii). *Latest research and project information including sharing best practice*
10. Yes. In particular the Local Climate Impacts Profile pilots.

How do you think this service might be improved?

11. See above. There should be the development of national (Scottish) regional (especially City-Regions), and local (down to the level of individual settlements) Spatial Planning Scenarios in an effort to ensure that all statutory spatial plans fully incorporate both mitigation and adaptation measures. This will require political leadership as well as creative spatial planning.

iii. Tools and resources to support action in adapting to and mitigating climate change

12. Yes.

How do you think this service might be improved?

13. Development Plans should be the vehicles not only for the survey assessment of the present carbon emissions, but also for the preparation and carbon testing of plans to ensure that emissions are fully planned for and properly accounted into the future, and that Scotland is able to achieve its ambitious reduction targets.

iv. Training and support events

14. Yes. In 2008 the RTPIS Annual Conference addressed the topic of the 'Spatial Implications of Climate Change'.
15. A Conference report can be found at: <http://www.rtpi.org.uk/item/2360&ap=1>

How do you think this service might be improved?

16. Those responsible for spatial planning, from the NPF3 down, should create and embrace a framework of climate change spatial planning CPD and guidance to ensure that the skills and political will are present and will ensure the necessary actions to deliver climate change targets. Ideally this would be linked to the adoption of clear and positive guidance on Sustainable Development within or accompanying the redrafted Scottish Planning Policy.

Question 4. What are the equalities implications of the proposed Framework?

17. The Institute has no comment to make on this question.

Question 5. The Government wishes to identify barriers to effective climate change adaptation and to address these barriers, where possible.

Are you aware of particular rules, regulations or government actions that pose a barrier to you in effectively adapting to climate change?

18. See above.

If so, please identify up to three which you would like the Government to address.

- provide an effective working definition of Sustainable Development and incorporate it into policy across Government; and
- in particular, ensure that NPF3 fully incorporates the targets for sustainable development, including meeting emission reductions, climate change mitigation and adaptation.

Question 6: In Chapter 3, we set out the roles for the public sector, local government, the voluntary and business sectors which, if enacted, we believe will build resilience to a changing climate.

6a If you are responding from an organisation or institution (as you have identified in your Respondent Information Form), please offer your views on the roles set out for the sector which best represents your organisation.

19. The RTPI has produced its own response to the challenge of Climate Change in the form of the 7 Commitments document which is summarised in Annex 2 below: 'outcomes' from the document which may be of particular relevance to climate change adaptation are emboldened.

6b If you are responding from an organisation or institution, please offer your views on the roles set out for other sectors you work with.

20. While it is vital that the four agencies mentioned are embracing Climate Change challenges, with 3 Action Plans out of 4 drafted, this should be an essential (public) part of all arms of Government, and it is vital that Government leads by example in 'walking the climate change walk' in all areas of its endeavours.

6c If you are responding as an individual not affiliated to an organisation (as you have identified in your Respondent Information Form), please offer your views on the roles set out for any sectors you interact with.

N/A

Question 7. Please provide any additional comments you have on any aspect of the consultation.

N/A

The RTPI's 7 COMMITMENTS

The RTPI is developing a living and continuously improved action plan, taking forward its work with partners and services for members in the priority area of addressing climate change. The action plan is structured around 7 commitments which the Institute has agreed will collectively represent (as its major priority) its response to the challenge of climate change

1 PROMOTE BEHAVIOURAL CHANGE

The RTPI will promote understanding of how effective spatial planning helps meet carbon budgets and targets through managing demand for finite natural resources and energy usage. This means supporting individuals, organisations and communities to change their behaviour to:

- reduce the overall demand for energy and particularly for carbon consuming travel
- shift increasingly to the use of renewable energy
- reduce the consumption of natural resources

We will work with governments and other partners to devise means of assessing and fairly sharing carbon budget costs to help reduce carbon footprints through national targets and policies. We will also help do this through the implementation and monitoring of local plans and policies.

We will support spatial planners' contribution to behavioural change as they identify more sustainable futures through effective community engagement in plan making and development management, as well as through our Planning Aid and other community-based work.

OUTCOMES

1. Working with governments to identify and promote key carbon/energy objectives and targets that are amenable to planning solutions

2. Using research to identify and evaluate techniques (policies within plans and other actions including effective community engagement) that can achieve positive behavioural change

3. Using research to identify or develop and evaluate carbon and energy proofing tools to be applied to plan-making and development management decision-making

4. Promoting the uptake and development of high net effect techniques and tools via Commitment 6.

2 ADAPT EXISTING PLACES

The RTPI will demonstrate how planning can help people adapt existing buildings and places to be more sustainable. We cannot rely on new development to ensure a sustainable global future, because most resource and energy use and carbon emissions emerge from existing places. The challenge is to adapt these places and to ensure that planning supports and encourages the necessary changes.

We will work with governments and other partners to identify and disseminate new means by which planning can provide incentives for adaptive change to existing buildings and places.

OUTCOMES

1. Link to Commitment 1 – behavioural change is achieved using planning community engagement as a means to build commitments to action from key stakeholders and in communities. Identify and campaign for positive behaviours.

- 2. Link to Commitment 3 – legislative and regulatory change is achieved to incentivise positive management of existing stock. Identify and campaign for positive reforms.**
- 3. Identify, evaluate and promote tools and techniques for adaptation of existing places through planning.**

3 WORK TOWARDS RESPONSIVE LEGISLATION AND POLICIES

The RTPI will undertake a review of planning-related legislative and policy obstacles to achieving sustainable development that responds to climate change at the UK and nations government levels. UK Governments have changed policy and practice to enable better responses to climate change in order to reduce carbon emissions by 80% by 2050. However, there is much still to do.

The RTPI will work with other professional disciplines, development sector and environmental interest groups to undertake an integrated review and identify where further reform is required. We will feed the results of this research back to Governments with specific proposals for further change. We seek Governments' commitments to consider and implement the policy and practice recommendations that we will make.

OUTCOMES

Research report containing:

- 1. Target list of proposals for planning legislative change by UK nation with reasoned justification.*
- 2. Target list of proposals for planning policy change by UK nation with reasoned justification.*
- 3. Criteria-based monitoring framework for the climate proofing of UK planning policy and legislation.*

4 IMPROVE CURRENT PRACTICE

The RTPI will undertake an evaluation of policies such as the 'Merton Rule' at the regional and local level, to develop a good practice tool-kit of effective spatial planning practices which address climate change imperatives. Spatial planners have been innovating to develop new, climate-responsive policies and practices, but planners look to the RTPI to help them identify what works best.

We will also develop a tool-kit of tests, enabling the climate change proofing of regional and local plans and policies. Plans can contain innovative climate change responsive policies, but due to the effects of other policies and proposals, still produce poor climate change outcomes. Various tests have been developed to audit and climate-proof policies: spatial planners need to know what works best.

We will seek partners in government departments and agencies, and universities engaged in research to identify, evaluate and disseminate the best of this innovation, supporting innovative climate impact reducing policies and climate proofed plans, whilst further clarifying and simplifying the relationships between building design, building control and spatial planning on these issues.

OUTCOMES

- 1. Link to Commitment 1 – behavioural change is achieved using planning community engagement as a means to build commitments to action from key stakeholders and in communities. Identify and campaign for positive behaviours.**

2. **Link to Commitment 2 – Policy and practice changes support the adaptation of existing places. Identify and campaign for positive reforms and behaviours.**
3. **Link to Commitment 3 – legislative and regulatory change is achieved to incentivise positive management of existing stock. Identify and campaign for positive reforms.**
4. **Identify, evaluate and promote tools and techniques for climate change proofing of regional and local plans and policies.**

5 CELEBRATE BEST PRACTICE

The RTPI will identify ideas and work that demonstrate inspiring responses to climate change as candidates for all of our awards. The RTPI assesses and judges many entries for its existing planning awards. We shall ensure that tackling the climate change imperative is a fundamental requirement of our awards schemes.

We will use our awards to provide case studies that represent inspirational practice in responding to climate change.

OUTCOMES

Revised judging criteria, requiring that all successful entries will demonstrate best practice/innovation in managing carbon/climate impacts

2. Introduction of new skills to judging process as required

3. Revised entry and data management procedures for awards enable extraction of case study material for Commitment 6 from awards entries

6 COMPILE A COMPENDIUM OF BEST PRACTICE

The RTPI will set out the results derived from the seven commitments and related actions in an on-line compendium of world class best planning practice and research, accessible to and owned by spatial planners but shared with everyone.

There are already valuable sources of data through other professional bodies and agencies. We will seek to work together to ensure that data is shared and signposted between these and other sources.

OUTCOMES

1. Establish ‘practice climate change gateway’ on RTPI website

2. Rising presence of peer reviewed / quality assured climate change practice reference sources on RTPI website

3. Improve data management/search facilities as content scale rises

4. Improve user interactivity as content scale rises

7 DEVELOP CLIMATE CHANGE EDUCATION AND SKILLS

RTPI will review and change our education and life long learning requirements to ensure that all members have the knowledge and skills to respond effectively to climate change.

We will work with universities and other education partners to ensure that climate change is given necessary prominence in learning outcomes in professional education and training.

We will develop our Lifelong Learning and Continuing Professional Development policy to require that all members identify in the Professional Development Programmes how their learning and practice relate effectively to climate change imperatives.

We will review and develop our policy for approving training providers, taking into account the critical importance of climate change in planning education and training.

OUTCOMES

1. We will develop our learning outcomes for initial planning education to more explicitly focus on climate change so that all new graduates from accredited planning schools will have the tools to contribute to the sustainable development agenda.

[Higher Education and the RTPI are already addressing climate change issues in the curriculum. For example in May this year the RTPI accredited a new masters course at UCL in Sustainable Urbanism. This programme focuses on how sustainable development can deliver social, economic and environmental outcomes in an urban context.]

2. We will develop a membership strategy and policies that ensures the profession is equipped to make a positive impact on climate change.

3. Through the CPD process, we will require members to evidence how they are continuing to update their skills and knowledge to influence planning policy and practice within the context of climate change. To facilitate this we will work with learning providers to provide high quality, approved training for members.