



RTPI

mediation of space · making of place

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27 July 2009

Dear Mr Muir

People, Places and Planet

The Royal Town Planning Institute (RTPI) welcomes the opportunity to respond to this consultation paper which addresses Sustainable Development and which aims to facilitate dialogue with those whose work involves shaping the policies, investment and delivery decisions about the future of Scotland's places.

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.

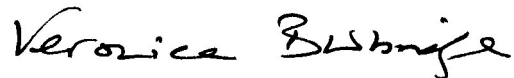
Since devolution, the Institute has empowered its RTPI in Scotland Office, together with its Scottish Executive Committee, with the responsibility for working with government and public bodies generally for the improvement of the planning system in Scotland. This is in accordance with its charter obligation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

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 Architecture + Design Scotland to sustainable development and the need to address climate change by mitigation and adaptation. We would like to encourage greater emphasis on the role of spatial planning in achieving this through the National Planning Framework, Scottish Planning Policy, Strategic and Local Development Plans, and the Development Management system.

The Institute is developing its own action programme in response to climate change and we would welcome the opportunity to work with A+DS 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

Annex 1

People, Places and Planet: position paper by Architecture + Design Scotland **Response by the Royal Town Planning Institute in Scotland**

a) Does the Position Paper clarify the key issues for making sustainable places?

1. The Institute supports the high priority given by Architecture + Design Scotland to sustainable development and the need to address climate change by mitigation and adaptation. Section 1.1 of the position paper addresses the nature of sustainable design and a clear definition of sustainable development at this point might have been helpful.
2. We agree with the assertion in Raymond Young's Foreword that 'Sustainable places need to respond to a myriad of issues, including transport connectivity and energy efficiency.' However, we view spatial planning as the mechanism for realising the much needed 'joined up' vision. Therefore, we would like to encourage greater emphasis throughout the position statement on the role of spatial planning in achieving sustainable places. This must be achieved at all levels through the National Planning Framework, Scottish Planning Policy, Strategic and Local Development Plans, and the Development Management system.
3. The actions identified for A+DS on page 43 of the position statement must have a direct impact not only on new development as it comes forward, but also on the current and next rounds of Development Plan preparation and implementation. While effective guidance on what is meant by a sustainable building or a sustainable place would be valuable, only when these are fully integrated into the Scottish Planning System can we hope to address the impacts of climate change in an effective manner. It will be important to build on the experience of A+DS's current work with Highland Council on the city visioning initiative for Inverness and to make more information available on the results of this exercise. The diagram on page 15 might have been linked more clearly to the development planning process.
4. It will also be important for A+DS to work directly with the public sector which must lead by example in its own developments. Tackling climate change is a major challenge and market solutions will not respond in time.
5. We support the emphasis given in the document to local distinctiveness and character of 'place'. This implies that to be sustainable, design needs to be 'well rooted' and to respect local culture and heritage. The sustainability duty should relate to the existing built environment, the cultural environment, the historic environment, and the natural environment. Sustainable places should be maintained as well as created, and both mitigation and adaptation of climate change factors will be required.
6. Concern about the ecological footprint (p13, para 2) should not be taken to be advocacy for the wholesale replacement of buildings. Some indication of percentage renewed each year would be helpful, as would reference to the retrofitting of existing buildings and their locational advantages, appropriateness to site, and embodied energy.
7. It is difficult in such a short document to summarise details of the climate challenge facing Scotland. As a generality it might be helpful to provide links to more comprehensive guidance; to deal with the national and strategic levels and then move to the individual building and place; and to focus on the precise implications for settlement structures and building design.

8. With regard to detail, it might be helpful if reference to the UK Climate Impacts Programme were written out in full, if reference to 'carbon dioxide' output were replaced by 'greenhouse gas' emissions; and there might be some form of introduction or glossary for terms such as *listed buildings* and *conservation areas*.
9. It might be helpful to link the section 3 on Sustainable Places more directly to the guidance given in 'Designing Places' with the clear statement that Scottish government considers that good design should be a feature of all residential, industrial, commercial and recreational development. The section on 'Enabling Vibrant Communities' might be structured more clearly to address landscape and environmental services and to include factors such as orientation, microclimate and use of local materials. Context and heritage, both cultural and natural, should also be covered.
10. Additional aspects not mentioned (bullet points p21) might include *sheltered, secure, sunny, attractive, and beautiful*. For 'inherited physical settings' (p23) read *contexts*. The term 'public realm' should be explained more clearly. In addition, perhaps there should be a specific reference to tackling existing buildings to include the creative challenges of matching re-use with existing structures, spaces, places and the issue of embodied energy. Other factors to add to the list of points (page 21) describing sustainable places might be *good broadband access* and *good public accessibility*.
11. We support the general principles of 'long life, loose fit' and consider that allowing flexibility for the upgrading of services will be especially important. These principles should support and complement principles of beauty and local distinctiveness, and community engagement in design and management.

b) Does the Position Paper appropriately identify the roles of A+DS, and key players?

Role of A+DS

12. Section 1.3 might provide a clearer explanation of the role of A + DS, its governance and staff resource, and any new directions it will take following the recent review of its work. It would be useful to have a clear statement of A+DS's duty as a public body to promote sustainability or sustainable development.
13. We consider that greater A+DS engagement with the Scottish planning system is vital. Perhaps initiatives which also focus on 'recognising context' and 'designing in context' might be helpful. There will be an important role for A+DS to play in liaison with key agencies such as SEPA, SNH, and Historic Scotland in relation to strategic and local development plans.
14. It would also be useful to have an explanation of the role that A+DS will play in relation to National Developments to ensure that there is a genuine balance of economic, environmental and social factors in achieving climate change and sustainable development objectives.
15. A+DS might also play a role in relation to actions and guidance emerging at the European level. For instance it would be useful to explain what the practical implications for designers might be in the European Directive (page 12) on the energy performance of buildings.

16. It would be timely and effective to see greater support from A+DS for the third sector, including bodies such as Greenspace Scotland and the Built Environment Forum for Scotland (BEFS), and for closer working on climate change issues with the Scotland and Northern Ireland Forum for Environmental Research (SNIFFER) and the associated Scottish Climate Change Impacts Partnership (SCCIP).
17. Practical responses are required to climate change challenges, including consultation responses and the sharing of technical information and links. There may be too much information 'out there': perhaps what it requires is a web-site dedicated to Building Sustainable Development –there may be a parallel with the site <http://www.understandingconservation.org/>

Role of Central Government

18. It might be helpful if the public sector roles might have been more clearly differentiated. Government has a major responsibility to lead on sustainable development matters, especially where they relate to climate change actions. The public sector has important roles, including:
 - as building owner/client/operator - a leadership role on behalf of community;
 - as planning controller/manager;
 - as funder, public loan or grant provider; and
 - as operator and funder of grant and loan programmes which should include sustainable development and climate change requirements.
19. The implications of Local Authorities' sustainability duty might also have been considered.

Role of Professional Bodies

20. The RTPi in Scotland will be happy to engage with A+DS in further work on this subject. A copy extract from the recent RTPi publication *7 Commitments: learning to live with Climate Change* is attached as Annex 2. In recent years, A+DS Board members have kindly given talks to RTPi Chapter meetings to encourage discussion of design issues and the Institute hopes that we will be able to involve A+DS in CPD activities in the future.

c) Are the tools and techniques mentioned helpful?

21. The publication of tools for assessment is very useful and it would be helpful to have further explanation of these tools available on a website where new approaches could also be signposted. This would keep the document as a 'live' document and encourage the sharing of good practice. This would be particularly useful in drawing experience from within Scotland and from Europe and elsewhere. It would provide useful guidance for planning authorities and for others involved in the planning process.
22. Perhaps some of the examples might benefit from further explanation. For example, the 'wind rose' map (page 29) needs a little more explanation to assist interpretation. In addition, it might be appropriate to reflect a little on the difficulties of objective assessment and the need for basic assumptions to be clear in such an exercise.
23. Other detailed comments include the need for illustrations chosen to provide a good fit with the subject. With the spaces given over to car parking on the peripheral site, illustrated on page 22, this scheme may not be the most appropriate illustration of sustainable development. To begin to understand it better, even as a sketch, it would have been helpful to have had a scale and a North point.

24. With regard to techniques, mention might be made of the work of the Prince's Foundation in Scotland at Ellon and Cumnock based on earlier work at Poundbury. The brief followed in these examples is almost a faithful description of many of Scotland's traditional places, suggesting that we must *learn* from context, not fail to see it, ignore it, or reject it out of hand. There may not be a one size fits all solution, but a version of the Poundbury brief, tweaked for Scotland, and with reference to local materials, 'long life loose fit' and so on, and the importance of site and context might not go far wrong. These themes have been explored in recent editions of the *Scottish Planner*.

Annex 2

The RTPI's 7 Commitments: Climate Change Challenge

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

- 1. 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.