

# Consultation Response

## Circular Economy Route Map Consultation

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**Question 1: To what extent do you agree with the priority actions proposed within the Reduce and reuse strategic aim? Please provide evidence to support your answer if possible.**

### Strongly Agree

RTPI Scotland fully supports the proposed priority actions set out in the consultation paper for their promotion of responsible consumption, production reuse, reducing food waste and embedding circular economy construction practices.

We are pleased to see acknowledgement in the consultation paper of the leading role the construction sector will play in implementing circular economy practices. The scale of change required by this sector to support the ambitions of a circular economy should not be understated. It is critical that stakeholders are supported through this transition with the publication of detailed and comprehensive guidance. We therefore welcome the actions set out in this consultation paper which seek to provide this type of support to stakeholders through the development of regional platforms and best practice guidance, as well as identifying the barriers and skills gaps that need to be addressed to facilitate a circular economy approach to maintaining our current building stock and infrastructure.

In addition to the construction sector, the planning system can make a significant contribution to the aims of a circular economy through promoting the adaptive reuse of buildings and the recycling of construction waste. The planning system plays a significant role in coordinating waste and recycling infrastructure through national and local development plans and (in future) through the new Regional Spatial Strategies introduced by the Planning (Scotland) Act 2019. This can be achieved, for example, through the identification of appropriate waste handling/recycling sites in industrial areas, ensuring existing waste and recycling facilities are safeguarded from new development (through an agent of change type approach) and ensuring appropriate plans are put in place for the new facilities required by the actions outlined in this route map. It is striking that this consultation does not say very much about the spatial consequences of changing waste management and circular economy approaches. For example, regional hubs for reclaimed or reusable construction materials/assets will need to be carefully planned – located not too far from sources or end users, and accessible to suitable transport infrastructure, e.g., rail and road networks. Food waste recycling targets need to be accompanied by an understanding of **what types of facilities** are needed to process that additional volume, and **where** those facilities should be located.

Consequently, whilst we welcome the consultation paper's references to the National Planning Framework 4, it will be critical that local authority planners are also adequately supported and resourced in carrying out their duties in a way that promotes and further supports the transition to circular construction practices and targets for enhanced (food waste) recycling. RTPI Scotland's 2023 update to the Resourcing the Planning Service research reveals that local planning authorities are under mounting pressures to deal with increasing workloads within a financial climate of shrinking resources [1]. Key findings of this research include:

- Planning expenditure is still falling, with a -28.6% drop since 2010-11, leaving it as the most reduced and lowest funded local authority department on a national scale.

- Workforce is at the lowest level in five years at 1205 members of staff in local authorities as of 2022/23. The previous year's level was at 1242.
- The planning workforce continues to age, and employees 50+ now represent 39.6% of the total.
- RTPI Scotland's 2022 update reported that the Planning (Scotland) Act 2019 has introduced 49 unfunded duties on local authorities. The Scottish Government's roll out of this legislation risks planners (and the planning system) being immediately placed on the back foot in terms of delivering on these duties without a robust resourcing and upskilling strategy in place.
- Based on past statistics and current trends, there appear to be too few planners entering the sector through higher education to meet replacement demands.

Without adequate resources, local planning authorities will struggle to fully realise their potential in contributing to the implantation of circular economy practices. We suggest that this route map is developed further to include/consider the spatial implications of the proposals and actions set out.

In the above regard, we acknowledge the Scottish Government's consultation on resourcing Scotland's planning system, which is open until 31 May 2024 [2]. It is important that the outcomes of this consultation also feed into the Scottish Government's continued work on Scotland's Circular Economy Route Map, in relation to (as an example) upskilling planners' climate literacy and their ability to assess carbon emissions in line with NPF4's zero waste national policy.

[1] <https://www.rtpi.org.uk/research/2023/december/resourcing-the-planning-service-rtpi-scotland-research-briefing/>

[2] <https://consult.gov.scot/local-government-and-communities/resourcing-scotlands-planning-system/>

## **Question 2 – To what extent do you agree with the further actions to 2030 listed across the Reduce and reuse strategic aim?**

### **Agree**

RTPI Scotland broadly supports the further actions set out in the consultation paper. We agree that the development of new, and the promotion of existing, best practice standards will play an important role in facilitating behaviour change in the construction sector. We also welcome the recognition under Further Action No. 2 of Section 3 of the important role NPF4 plays in supporting the refurbishment of existing buildings over new build, and the proposed action to work with stakeholders to understand the impact of NPF4 policies. The planning profession is critical to implementing NPF4 policies. Planning should, therefore, be recognised as an integral and overarching means by which we can reduce resource consumption in society. The purpose of planning is to manage the use and development of land in the long-term public interest. Land itself should be considered as a material commodity that, through a functioning planning system can be either protected, developed, redeveloped, or managed in a manner that contributes to a functioning circular economy. This can be seen with policies that encourage re-use of vacant and derelict land and disincentivises greenfield development. Further to this, what development is permitted on this precious resource will also impact upon consumption rates with, for example, more densely populated areas consuming on average less materials [3]. Therefore, by creating dense and walkable places with high quality placemaking through the implementation of 20-minute neighbourhoods and local living, planning can reduce societal resource consumption whilst also addressing a plethora of other outcomes, such as reducing health inequalities and meeting net zero targets [4].

We suggest that the route map consider using spatial planning to support circular economy and zero waste objectives through a circular city approach. Understanding

material flows into and out of places and economic sectors can reveal opportunities for the co-location of complementary land uses [5]. For example, there are synergies between brewing and baking, with bread – one of the most commonly wasted food products – a useful ingredient for brewing. Bringing these types of business and land use into proximity can help to stimulate new relationships and collaborations and reduces the barriers to innovation. Circular city approaches are being adopted in numerous places [6], including London, Rio de Janeiro, Edinburgh, and Glasgow.

Given the above, we strongly recommend that planners are included in any future investigative work around the local application of NPF4 policies, as is proposed under Further Action No. 2 of Section 3. We would also stress that for planners to successfully implement NPF4 policies (through, for example, their LDPs and RSSs, as well as in their consideration of planning applications) they must have access to the right data, tools and skills. It is vital, therefore, that any future investigative work around the effectiveness of these policies also examines the data, skills, tools, and guidance that local planning authorities have available to support them in their work to implement these policies on the ground.

[3] European Environment Agency, *Urban sustainability issues: what is a resource-efficient city?*, Publications Office, 2016, <https://data.europa.eu/doi/10.2800/389017>

[4] <https://www.rtpi.org.uk/research/2021/march/20-minute-neighbourhoods/#:-:text=20 minute neighbourhoods are a,within a 20 minute walk>.

[5] [Circular Glasgow - Insights - Circle Economy \(circle-economy.com\)](https://www.circle-economy.com)

[6] [Cities and a circular economy | Ellen MacArthur Foundation](https://www.ellenmacarthurfoundation.org/cities-and-a-circular-economy)

### **Question 3 – To what extent do you agree with the priority actions proposed within the Modernise Recycling strategic aim?**

#### **Agree**

RTPI Scotland welcomes the proposed co-design approach to enhance householder and commercial recycling. As previously mentioned, planning should also be recognised in this approach as an integral and overarching means by which we can reduce resource consumption in society.

We note the following sub-priority actions are set out in the consultation paper:

- “Consideration of any additional infrastructure required to deliver high-performing services, linked to wider circular economy infrastructure requirements set out elsewhere in the Route Map”.
- “Assessment of the potential for multiple local authorities to collaborate or partner to deliver services, and the potential efficiencies and economies of scale that this may offer.

The successful implementation of these actions will not only require collaboration between local authorities, but also between local authority departments (including, for example, between planning and waste management departments), and with other key stakeholders in the public, private, and third sectors, and with communities. Consideration of circular economy principles needs to be applied to a range of public-sector decision-making areas such as planning, community planning, asset management, street maintenance, investment, health, and education service provision. This could be achieved through a place-based approach which considers all aspects of a place when considering an intervention. The Place Principle could support such collaborative place-based action to improve coordination between stakeholders, enhancing collaboration and communication across local authorities’ departments, key agencies, NGOs, and private sector. Therefore, whilst RTPI Scotland welcomes the proposed measures set out in the consultation, greater

consideration of and reference to the Place Principle and place-based approaches is necessary to support the development of a circular economy in Scotland.

In addition to the above, RTPI Scotland supports, in principle, a move from voluntary to mandatory requirements for local authorities. However, we would stress that for this to be successful, local authorities must have the necessary support and resources (in terms of funding, staff, and skills) to deliver this effectively. Local authorities are facing increasing resourcing pressures [7]. Local planning authorities, in particular, have experienced a reduction in planning expenditure of 28.6% since 2010-11 [8]. Additional duties should not be imposed on local authorities without a suitable resourcing strategy to set out how this will work in practice.

[7] [https://www.improvementservice.org.uk/\\_data/assets/pdf\\_file/0029/47828/Benchmarking-Overview-Report-2024.pdf](https://www.improvementservice.org.uk/_data/assets/pdf_file/0029/47828/Benchmarking-Overview-Report-2024.pdf)

[8] <https://www.rtpi.org.uk/research/2023/december/resourcing-the-planning-service-rtpi-scotland-research-briefing/>

#### **Question 4 – To what extent do you agree with the further actions to 2030 listed across the Modernise Recycling strategic aim?**

##### **Agree**

The further actions set out in the consultation paper appear to represent a positive way forward, provided local authorities are sufficiently resourced to deliver on any additional or enhanced duties that stem from their implementation.

We agree with the need to improve our data collection, collation, and analysis processes, which will be critical to monitor our progress towards a circular economy. Local planning authorities would also benefit from having access to such data to support them in their policy- and decision-making duties which will further support the delivery of improved infrastructure and services and other related spatial planning interventions.

#### **Question 5 – To what extent do you agree with the priority actions proposed within the Decarbonise disposal Strategic aim?**

##### **Agree**

RTPI Scotland is pleased to see acknowledgement in the consultation paper that we will require research, development, and innovation to drive forward the necessary improvements towards achieving our environmental outcomes. We also broadly support the priority action to develop and deliver a Residual Waste Plan.

We note that the proposed scope of the Plan includes to “investigate and make recommendations on Scotland’s long-term infrastructure requirements to manage waste”. It also includes that the Plan “consider how we manage legacy waste infrastructure to continue to minimise environmental impacts and maximise societal gains”. We take this opportunity to stress the important role of spatial planning in delivering these actions. As previously mentioned, the planning system plays a significant role in coordinating waste and recycling infrastructure through national and local development plans and (in future) through the new Regional Spatial Strategies introduced by the Planning (Scotland) Act 2019. This can be achieved, for example, through the identification of appropriate sites in industrial areas, ensuring existing facilities are safeguarded from new development (through an agent of change type

approach) and ensuring appropriate plans are put in place for new waste produced by new developments. It is important this this is fully recognised in any future Residual Waste Plan.

In addition to the above, we support the establishment of a Residual Waste Advisory Panel. We strongly recommend that this Panel include members will expertise in town planning (as well as waste scientists, data experts, waste management companies, and health and environmental experts etc.) to help achieve a cross-sectoral and partnership approach to the development of a Residual Waste Plan.

## **Question 6 – To what extent do you agree with the further actions to 2030 listed across the Decarbonise disposal strategic aim?**

### **Agree**

We note that one of the further actions included in the consultation paper is to “facilitate the co-production of guidance for effective community engagement”. Reducing our carbon emissions and achieving a circular economy will require commitment and action from everyone in the country, including Scotland’s diverse urban and rural communities. We therefore support a transparent and partnership approach to community engagement. We would also stress the importance of understanding how such community engagement will feed into the work of other sectors and local government departments. For example, our approach to waste management has important spatial planning implications. LDPs and RSSs have an important role to play in ensuring that we have the foundational spatial infrastructure required to research and innovate new approaches to waste management, capture and analyse data, as well as ensure we have the right facilities in the right places to maximise opportunities to adopt circular waste practices across Scotland.

Consequently, a holistic and coordinated approach should be taken with respect to community engagement practices to ensure wide-reaching impact is achieved across sectors, disciplines, and government departments. This will help ensure that any community engagement undertaken is meaningful, impactful, builds trust, and helps to facilitate the stewardship and behaviour change we are seeking to achieve through this Circular Economy Route Map.

## **Question 7 – To what extent do you agree with the priority actions proposed within the Strengthen the circular economy strategic aim?**

### **Agree**

#### **Circular Economy Strategy:**

The vital role planning can play in moving towards a circular economy has been recognised within the NPF4 and is set out within the published guidance on Local Development Plans. With the NPF4 and next generation LDPs now set for 10 years, RTPI Scotland is unsure of the intended synchronicity between the Circular Economy Strategy, if set at 5 years. Another approach may be to set the strategy for a 10-year period whilst allowing for periodic reviews in line with the approach that is being adopted (and currently being consulted upon [9]) for NPF4 and LDPs. It is worth noting that regarding waste planning, strategic planning approaches can be more successful. Therefore, the emerging role of Regional Spatial Strategies should be considered fully in any future Circular Economy Strategy.

By its nature, planning provides the cross-cutting spatial oversight for physical interventions that will support our move towards a circular economy. Therefore, how planning relates to a proposed Circular Economy Strategy, how data and research can be utilised to drive evidence-based decision making, and how we can develop the



planning skills and workforce necessary to achieve ambitions of a circular economy all need careful consideration.

#### **Circular Economy Targets:**

RTPI Scotland welcomes the recognition that there should be greater ambition in the field of consumption and reduction targets. Statutory targets are a feature of high-performing systems in other nations or regions, particularly where they are introduced alongside other key measures. As set out already in our response to this consultation, RTPI Scotland believes that the planning system has a vital role to play in helping deliver any proposed statutory targets.

RTPI Scotland is pleased to see recognition of the need for a robust and accountable monitoring framework. In our response to the 2023 consultation on the Circular Economy (Scotland) Bill we argued that circular economy targets must undergo a robust and transparent review, monitoring and reporting process. Only through effective reporting and monitoring will it be possible to ensure the ongoing relevance of circular economy targets, as well as the effectiveness of associated delivery actions.

[9] <https://consult.gov.scot/local-government-and-communities/development-plan-amendment-regulations/>

### **Question 8 – To what extent do you agree with the further actions to 2030 listed across the Strengthen the circular economy strategic aim?**

#### **Agree**

As previously stated, RTPI Scotland sees the planning system as central to achieving the goals of this consultation paper, by providing cross-cutting spatial oversight for physical interventions that will support our move towards a circular economy.

We are pleased to see skills and training identified as an action in this section of the consultation paper. Our education and skills systems are critical in ensuring we have a healthy pipeline of skilled professionals to drive forward our just transition to a circular economy. Consequently, we believe this should be given priority to ensure a sufficiently skilled future pipeline is achieved, reducing the potential for a future skilled workforce deficit.

We take this opportunity to stress the critical role that planners currently play and will continue to play in achieving our circular economy goals. Planners require a wide range of knowledge and skills to carry out their duties effectively and efficiently – including a range of green skills. RTPI Scotland's 2023 resourcing update found that the workforce in local planning authorities is at its lowest level in five years, with the planning workforce demographic continuing to age, and current trends emerging from Scotland's planning schools indicating that the replacement rate of planners through education is inadequate to address these demographic concerns. Without a skilled, well-trained, and robust planning profession, our circular economy ambitions will not be fully realised.

### **Question 9 – Please provide any further information or evidence that should be considered in the accompanying Equalities Impact Assessment**

RTPI Scotland agrees that whilst the Route Map itself is not discriminatory, the interventions proposed could result in unintended consequences to those with protected characteristics. We would welcome a thorough assessment as each intervention is further developed.



### **Question 10 – Please provide any further information or evidence that should be considered in the accompanying Fairer Scotland Assessment**

Different communities and places are more vulnerable to climate change and the environmental impacts resulting from our current waste management practices. However, whilst our transition to a circular economy will help to reduce these vulnerabilities, we must also ensure that our response to creating a circular economy does not inadvertently adversely affect these same communities – i.e., by worsening their vulnerabilities in the short to longer terms. RTPI Scotland published research on this topic in January 2020, exploring this issue of climate justice in spatial planning [10].

[10] <https://www.rtpi.org.uk/media/3682/five-reasons-for-climate-justice-in-spatial-planning.pdf>

### **Question 11 – Please provide any further information or evidence that should be considered in the accompanying Island Communities Impact Assessment**

It is important that in the delivery of the priority and further actions set out in the consultation paper that we **do not** take an urban-centric approach. It is vital that the potential impact of these actions (both positive and negative) on Scotland's rural communities, as well as the potential contributions rural communities can make towards the delivery of the Circular Economy Route Map, are given full consideration.

The RTPI's Rural Planning in the 2020s research project [11] highlighted that not all rural areas are the same. Rural places can be remote or near urban, coastal, or upland areas. Some are resource and amenity rich, whilst others face significant deprivation. This research project looked at, amongst other things, how land-use planning can effectively support the delivery of sustainable development in rural areas. The report found that rural communities are sites of potential adaptation in which innovation can thrive and have an important role to play in contributing to the achievement of Scotland's net zero targets.

Innovation is recognised in this consultation paper as key to achieving the delivery of the priority and further actions. We would therefore encourage the Scottish Government to consider, not just the impacts (positive and negative) of these actions on rural communities, but the variety of roles rural communities can play in delivering these actions in a way that will positively contribute to their economic and social growth as we move towards a circular economy.

[11] <https://www.rtpi.org.uk/policy-and-research/research/rural-planning-in-the-2020s/>

### **Question 12 – Please provide any further information that should be considered in the accompanying Business and Regulatory Impact Assessment**

We agree that publication of the Route Map alone will not result in additional financial costs or burdens on local authorities and enforcement bodies in Scotland.

We are pleased to see acknowledgement that implementing the actions will likely have financial implications. We take this opportunity to reiterate the important role the planning profession will play in delivering our circular economy aspirations. In order that local planning authorities can effectively contribute, it is vital that the resourcing challenges identified in RTPI Scotland recent research update on resourcing the planning system are addressed. If implemented effectively, the Circular Economy Route Map could result in significant benefits through an overall reduction in consumption and waste generation



which could result in cost savings for local authorities in the longer term. However, for us to achieve this longer-term benefit, it is vital that local authorities are appropriately funded to ensure the efficient and effective implementation of the priority and further actions – in terms of communications, community engagement, having the right tools available, and the staff, skills and training that will be required to achieve this.

**Question 13 – What are your views on the accuracy and scope of the environmental baseline set out in the SEA Environmental Report?**

No comment

**Question 14 – What are your views on the predicted environmental effects of the draft Circular Economy and Waste Route Map as set out in the SEA Environmental Report?**

The SEA's views on the predicted environmental effects of the draft Circular Economy and Waste Route Maps appear to be based on the assumption of its successful implementation. We agree that if implemented successfully, the Circular Economy and Waste Route Map has the potential to result in a number of positive outcomes for Scotland's environment. However, this can only be achieved if the Route Map is accompanied by adequate resourcing and support to all relevant stakeholders to facilitate positive behaviour change towards circular economy practices.

**Question 15 – What are your views regarding the potential reasonable alternatives, in reference to the approach set out in the SEA Environmental Report?**

No comment

**Question 16 – What are your views on the approach to mitigation, enhancement and monitoring of the environmental effects set out in the SEA Environmental Report?**

No comment