

Consultation Response

Climate change – draft Scottish National Adaptation Plan 3: consultation

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Lived and local experience

Question 1: What do you think the current effects of climate change are on people in Scotland?

The effects of climate change in Scotland are multifaceted. The alteration of weather patterns is leading to more frequent and intense weather events, including storms, floods and heatwaves, increasing the vulnerability of communities across Scotland, including health risks, damage to buildings and infrastructure, and the prevalence of pests and diseases which have adverse impacts on agriculture and ecosystems.

Planners are critical to building community resilience to climate change, and this is acknowledged in Scotland’s new National Planning Framework 4, in which “tackling the climate and nature crises” is an overarching national policy. This policy is now required to be addressed in Local Development Plans and must be given significant weight as part of planners’ determination of development proposals. This requires planners to have enhanced knowledge of a variety of different topics related combating and mitigating the risks of climate change and ensuring that Scotland’s communities are sufficiently resilient to its effects. These topics include knowledge around enhancing biodiversity, the provision of renewable energy infrastructure and grid connections, flood management and mitigation (to name just a few).

As our understanding of the effects of climate change continues to grow and evolve, so too do the policy and legislative requirements on the planning profession. RTPI Scotland’s 2022 update to the [Resourcing the Planning Service](#) research reported that the Planning (Scotland) Act 2019 introduced 49 unfunded duties on local authorities. This is in an environment of reduced capacity, in which planning expenditure in local authorities is continuing to fall (by 28.6% since 2010/11) and in which the planning workforce in local authorities is declining, with the workforce currently at its lowest level in five years according to [RTPI Scotland’s 2023 resourcing update](#). Whilst this resourcing crisis cannot be attributed directly to climate change, it is severely jeopardising planners’ abilities to address and mitigate the multifaceted effects of climate change on Scotland’s communities, both now and moving forward.

Question 2: What effects, if any, do you expect climate change will have on people in Scotland over the next five years?

Evidence shows us that climate change will continue to impact people across the globe, with reports that global temperatures will breach the 1.5 degrees Celsius threshold for the first time by 2027. We know that climate change and extreme weather events have already impacted Scotland’s communities and natural environment, and this impact is likely to continue and intensify over the coming decades. According to the Climate Change Committee, Scotland is not on target to achieve its goal of 75% emissions reduction by 2030. To meet our post-2030 target, stronger and more rapid action is required which will impact Scotland’s communities over the next five years.

As previously mentioned, the planning profession have a critical role to play in ensuring the future resilience of Scotland’s communities in terms of where they live, their access

to employment, local services and amenities, ensuring the provision of renewable energy to support Scotland's future energy needs, ensuring that new development results in biodiversity enhancement rather than depletion etc.

In the above regard, local planning authorities are in the process of preparing their new style local development plans which, in accordance with Policy 1 of NPF4, "must address the global climate emergency and nature crisis by ensuring the spatial strategy will reduce emissions and adapt to current and future risks of climate change by promoting nature recovery and restoration in the area". It is expected that every local authority will have a new style LDP in place by May 2028, and that these will have a 10-year life span. Consequently, it is vital they are fit for purpose in terms of meeting this policy goal.

We also note that the Scottish Government is currently in the process of preparing new guidance to support the implementation of this policy and RTPI Scotland currently sits on the Advisory Group that was created to support this process.

The next five years are, therefore, going to be a critical time for the planning profession as local planning authorities develop their new style Local Development Plans, and as planning professionals in both the public and private sectors familiarise themselves with, and become adept at implementing the Scottish Government's climate mitigation guidance as well as other key guidance documents that are emerging related to the implementation of other NPF4 policies. It is vital therefore that Scotland's third Adaptation Plan appropriately aligns with this work that is already underway.

We also note that the Scottish Government is currently consulting on regulations that will allow for amendments to be made to the National Planning Framework and Local Development Plans during their 10-year lifespan. This could also help to drive forward Scotland's attainment of our net zero ambitions by enabling NPF4 and LDPs to be amended to better reflect the actions that are necessary to help us achieve these targets.

However, in order for the planning system to have the necessary impact over the next 5 years and beyond, the planning profession must be equipped with the necessary skills, tools, and other resources (financial and otherwise) to implement the ambitions of NPF4 on the ground. The planning profession is already struggling with the limited resources available to allow them to carry out their duties (reference 2023 resourcing update). This must be addressed immediately, and most certainly within the next five years, if Scotland is to deliver the spatial outcomes required to support our move towards net zero.

Question 3: What actions, if any, would you be willing and able to take to adapt to climate change?

The Royal Town Planning Institute (RTPI) is the professional body representing the planning system and planning professionals in the UK and internationally and has more than 27,000 members worldwide. The Institute champions the power of planning to create sustainable, prosperous places and vibrant communities. As a learned society, we use our expertise and research to bring evidence and thought leadership to shape planning policies and thinking. The RTPI has produced much research on climate change over the years in our endeavour to push for UK planning systems that support the rollout of smart energy grids, help cities develop strategic climate resilience policy, and support the UN's campaign for the Sustainable Development Goals, amongst other projects. As an Institute, climate action underpins our 2020 – 2030 Corporate Strategy with an ambition to reach net zero by 2025. To achieve this, we have developed a climate action plan to minimise the climate impacts of our own operations and to accelerate collective climate action. Further information about this climate action plan can be found here: [RTPI | Climate action](#), and we are continuing to find new ways to minimise our impact and achieve our net zero targets as quickly and as efficiently as possible.

From the point of view of the planning profession, planners are required, through the carrying out of their duties under the Town and Country Planning (Scotland) Act 1997, to implement the policies of NPF4, including those related to tackling the twin climate and nature crises. Planners also have a duty to “manage the development and use of land in the long-term public interest” in accordance with the purpose of planning introduced by the Planning (Scotland) Act 2019. This purpose of planning aligns intricately with enhancing Scotland’s resilience to climate change. Consequently, the work that planners do on a daily basis has climate adaptation implications for existing and future communities across Scotland.

This work requires knowledge and skills on a range of topics related to biodiversity, energy, flood mitigation, green infrastructure, trees, and nature conservation (to name just a few). Many local authorities have lost in-house expertise in these areas. Tackling and adapting to climate change will require access to this type of expertise, and professionals will need additional training and support to make new statutory targets work in practice. We know, for example, from our work in England that the introduction of biodiversity net gain has created a lot of uncertainty about the technicalities of measuring and assessing biodiversity, with our members reporting only a very low confidence (rated as 2/10) in their knowledge on this topic. This is a significant risk to the implementation of a new biodiversity metric or tool.

Question 4: What factor(s), if any, would prevent you from taking action to adapt to climate change and become more climate resilient?

One of the greatest barriers to the planning profession’s ability to tackle the climate and nature crises is the current pressures of diminishing resources combined with increased workloads.

Our 2023 update to the Resourcing the Planning Service research [4] reveals that:

- 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 rollout 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.

Question 5: What action(s) do you think the Scottish Government should prioritise in order to build greater resilience to the impacts of climate change?

Building greater resilience to the impacts of climate change will require a whole-nation collaborative effort. RTPI Scotland believes that the above can only be accomplished by placing greater emphasis on place-based collaboration through the Place Principle. The Place Principle is an overarching concept which is clearly aligned with the objectives of this Adaptation Plan. However, if the Place Principle is to be effective, there is a need to

'give it teeth' and operationalise and monitor its work so it influences policy, practice and investment on the ground.

It is therefore vital that the Scottish Government prioritise the Place Principle moving forward. However, in order to fully realise this goal, it is also vital that there are sufficient resources in place for local planning authorities (in terms of funding, staff, and access to training, knowledge and skills) to address the current capacity issues previously discussed.

Outcome one: Nature connects

Question 6: The draft Adaptation Plan sets out actions which will be taken to protect and restore nature. Which of the following actions proposed around protecting and restoring nature should the Scottish Government prioritise for a better adapted Scotland? (check all that apply)

All the actions set out in the consultation paper have an important role to play in protecting and restoring our natural environment, and the planning system and profession will play a critical role in realising many of these.

The Planning (Scotland) Act 2019 introduced a new purpose of planning to "manage the development and use of land in the long-term public interest". This requires the balancing of multiple spatial objectives, and it should never be the case that we trade off one or more of these for another. Rather, the best planning seeks to achieve a variety of objectives in parallel. In addition, prioritising one action over another ignores the often complex and interwoven spatial implications of each of these actions. For example, planting more trees and creating more green spaces in built-up areas could have the double effect of joining up natural habitats. We believe, therefore, that rather than prioritising one action over the others, achieving the above actions should be undertaken in a holistic manner having regard to the unique characteristics and spatial contexts across Scotland.

Question 7: When you consider your local natural space e.g. park, canal, woodland or beach, what would you like to see improved in terms of blue and green space in your local area?

We would take this opportunity to reiterate the important role of the planning profession in enabling communities to achieve their ambitions for their local natural spaces. The intent of Policy 20 of NPF4 is to "protect and enhance blue and green infrastructure and their networks" and requires local planning authorities to "protect and enhance blue and green infrastructure and their networks" within their LDPs and through their assessment of development proposals.

In addition to considering what should be improved in local areas, it is also important to consider the mechanisms through which these improvements can be implemented. The Planning (Scotland) Act introduced Local Place Plans, which provide communities with a mechanism through which they can create a spatial plan for their local area, which can also include the provision of additional blue and green infrastructure. Local planning authorities are required to have regard to any approved LPP as part of the creation of their Local Development Plan.

However, the resource implications for communities wishing to produce LPPs, for planning authorities to support their development, and for plan implementation is a substantial concern for RTPI Scotland. We have previously called upon the Scottish Government to provide dedicated resources to support LPPs in the form of a national

grant scheme for communities (as has been established in England to support Neighbourhood Plans). In terms of funding allocation, we note the uneven uptake of neighbourhood planning in England where research has revealed a much lower uptake in urban and deprived communities with only 5% of completed plans in urban areas and just 6.7% of neighbourhood planning areas in the most deprived parts of the country. Therefore, any national grant scheme should target funding to communities sitting within the bottom 20% on the Scottish index of Multiple Deprivation, or similar measurement in rural areas, or areas with significant potential for growth.

Outcome Two: Communities

Question 8: For Scotland to adapt to the impacts of climate change, lots of different groups, such as individuals, communities, businesses and public bodies, will need to work together and support each other. How could others support you (or your organisation) to adapt to climate change over the next five years?

RTPI Scotland believes that to effectively adapt to climate change over the next five years, collaboration between and across a variety of stakeholders, as well as funding and regulatory support to facilitate adaptation efforts are all essential.

Communities, businesses, developers, public bodies as well as other organisations all play a vital role in implementing grassroots adaptation initiatives, raising awareness, and fostering social cohesion to collective climate action. The Place Principle provides a valuable framework to overcome organizational and sectoral boundaries, encouraging better collaboration and community involvement, and improving the impact of combined energy, resources, and investment. Developed by partners in the public and private sectors, the third sector, and communities, the Place Principle promotes a shared understanding of place and the need for a collaborative approach to a place's services and assets to achieve better outcomes for people and communities. It recognizes that place is where people, location, and resources combine to create a sense of identity and purpose, shaping the needs and potential of communities. By adopting a more joined-up, collaborative, and participative approach across all sectors within a place, better outcomes for everyone can be achieved, empowering people and communities to shape their own lives. Integrating the Place Principle into adaptation efforts also supports the National Performance Framework's collective purpose for Scotland, unlocking its potential to be applicable to where and how people live and work.

Question 9: In what way(s) could the plan help different groups across Scotland and/or its regions to collaborate on climate adaptation?

The Adaptation Plan represents an opportunity to foster a collaborative approach to climate adaptation across Scotland. By acknowledging the distinct characteristics and vulnerabilities of different regions, the plan can delineate clear roles, responsibilities, and coordination mechanisms for various groups. If undertaken correctly, the Plan has the potential to be a mechanism which operationalises the Place Principle and underscores the significance of collaborative, place-based strategies in bolstering climate resilience across Scotland. The Plan also has the potential to establish robust platforms for communication and knowledge sharing among central and local government, public bodies, businesses, third-sector organizations, and communities, each tailored to meet their specific needs.



Outcome three: Public services and infrastructure

Question 10: Advice from the Climate Change Committee is to adapt to 2 degrees C of warming and assess the risk for 4 degrees C. To what extent to do agree with this advice?

We agree with this approach.

Question 11: Would further guidance on future climate scenario(s) be useful when making plans and investment decisions?

Guidance is useful when it serves a clear purpose for an intended audience, has regard to already existing guidance, and sets out how it will add value to (and not unnecessarily duplicate or contradict) existing guidance.

The Planning (Scotland) Act 2019 introduced a range of new duties on the planning profession which has triggered the publication of several additional guidance materials (with yet more on the way). In this regard, the Scottish Government is in the process of preparing guidance on climate mitigation and adaptation to support the implementation of Policy 2 of NPF4. The purpose of the guidance will be to “aid the integration of climate considerations into development proposals, helping to avoid maladaptation, whilst supporting emissions reduction and increased resilience to climate risks”.

The Adaptation Plan and associated progress reports should have regard to what is already being done to adapt to the impacts of climate change, and any guidance that is already available to support these actions. We would support further guidance only if its purpose in the context of existing guidance is clearly established such that it adds value to a defined audience under clear circumstances. We are mindful of the ways in which the proliferation and duplication of guidance create an additional burden on practitioners.

Question 12: if yes, what sort of information or advice would be useful for you or your organisation when considering future climate scenarios in long-term planning or investments?

No comment

Question 13: Would an assessment of “cascading” risks from weather-related disruptions to infrastructure help you or your organisation to adapt?

RTPI Scotland recognises the potential value of an assessment of 'cascading' risks from weather-related disruptions to infrastructure. Understanding these risks could provide important insights into future planning needs, particularly for local authorities, by identifying areas where infrastructure vulnerabilities may exacerbate the impact of climate-related events on communities. This enhanced understanding has the potential to feed into Local Development Plans (LDPs) to ensure that infrastructure is strategically located, resilient, and supported by appropriate alternatives. By considering these cascading risks, local authorities and communities could better prepare for future climate challenges, enhance their resilience, and ensure that spatial planning decisions align with adaptation priorities.

Outcome four: Economy, business and industry



Question 14: What, if any, are the barriers to businesses accessing advice and support on climate risks?

No comment

Question 15: How should farming, fishing and forestry businesses be supported to adapt to climate change?

No comment

Question 16: How do you anticipate disruption to domestic and/or international supply chains caused by climate change will affect Scottish business, industry and consumers?

No comment

Question 17: What, if any, should the role of government be in supporting more resilient supply chains?

No comment

Question 18: What, if any, do you think are the business and innovation opportunities arising from climate change in Scotland?

The impacts of climate change in Scotland present numerous business and innovation opportunities across a variety of sectors. Renewable energy, sustainable agriculture, green infrastructure, climate-resilient building design, carbon capture and storage, sustainable transportation, and climate adaptation services stand out among these opportunities. Spatial planning plays a pivotal role in supporting and enhancing these innovative prospects. The planning system plays an important role in coordinating 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).

By strategically locating developments and infrastructure to support future business innovation, we can ensure the efficient use of resources while also minimising environmental impacts. It is important to understand the importance of spatial planning to deliver these actions. Embracing spatial planning principles will not only foster sustainable economic growth but also strengthen Scotland's resilience to climate change.

Question 19: What, if any, support would be required to encourage businesses in Scotland to take advantage of innovation opportunities arising from climate change?

No comment

Outcome five: International action

Question 20: How could the Scottish Government support communities impacted by climate change across the world?

Planning is pivotal in achieving sustainable development across the globe. The RTPI's International Strategy underscores the significance of planning in driving global progress towards a prosperous, fair, sustainable, and peaceful world, aligning with key

international agreements and agendas such as the United Nations New Urban Agenda and the Sustainable Development Goals. Planners possess the capability to influence various interconnected goals, SDG11 in particular, which focuses on making cities and communities inclusive, safe, resilient and sustainable.

The RTPI is an international organisation with members across the globe. An objective of our [International Strategy](#) is to further enhance our global presence and international membership and to develop partnerships with relevant local actors internationally (including professional associations of planning, planning schools, public sector bodies, private sector organisations, national and local governments, third sector organisations etc.).

The International Strategy recognises that our engagement with global challenges must be localised. Only by empowering local actors (including our international members) to take localised actions can we, cumulatively, deliver impact on a global scale.

We are aware of initiatives by the Scottish Government to connect and collaborate with other countries, to share learning and best practice through, for example, the Wellbeing Economy Governments Group (WEGO). There could be opportunities to expand on these current efforts and the RTPI would welcome an opportunity to collaborate on any future efforts and initiatives that can support the global planning profession.

Question 21: Scotland is known for its excellence in climate change research. Are there international adaptation focused research opportunities which Scottish-based academic work should focus on?

No comment

Enabling Factors

Question 22: What do you see as the main barrier to private investment for adaptation action?

Private investment is a hugely important mechanism through which climate adaptation measures can be delivered. For example, private sector housing and industrial developments can be a mechanism through which we can deliver flood mitigation measures, biodiversity enhancement initiatives, and renewable energy and blue/green infrastructure (to name but a few).

Many RTPI members work in the private sector, advising private clients who are looking to invest in development proposals that require planning approval. We are hearing from our members that a key barrier for their clients is uncertainty, particularly with respect to the interpretation and implementation of policy, as well as to the capacity of local planning authorities who are increasingly lacking the necessary resources to carry out their duties in a timely manner. We are aware that such uncertainty undermines developer confidence in the planning system, which is crucial to encourage private investment in spatial interventions to support climate adaptation.

Question 23: How can the Scottish Government support or incentivise more private investment in adaptation action?

Addressing uncertainty will require collaboration across and between government departments, the private sector, communities, and other organisations in line with the Place Principle. We are pleased to see that the Draft Adaptation Plan recognises the important role of the Place Principle in creating a shared understanding of climate



adaptation within our places. We also recognise that much work is already underway to better operationalise and embed the Place Principle into our everyday working practices. For example, the National Planning Improvement Champion is developing a new Planning Improvement Framework focused on collaboration, including improving stakeholder experiences of using the planning service. This offers promising avenues to mitigate current uncertainty within the planning system. By enhancing clarity, transparency and communication, we can foster a more conducive environment for private investment. This, in turn, will contribute to advancing Scotland's resilience to climate change.

Related to the above, it is also important that local authority planning departments have access to the necessary skills, knowledge, and resources to deliver their duties under the Act efficiently and consistently. We note that the Scottish Government is currently consulting on how we can better resource the planning system to support planners in their work.

Question 24: The proposed approach to monitoring and evaluating progress of the Adaptation Plan is set out below. Do you agree with the proposed approach to monitoring adaptation?

Yes. We agree with the proposed approach whilst noting the possibility that monitoring and evaluation of the other linked strategies (e.g., Climate Action Plan, Peatland Action Plan etc) are considered together to identify and exploit the synergies between them – whether in terms of indicators, data or time series.

Question 25: Do you have any suggestions of data or indicators that could be used to track adaptation outcomes in Scotland?

No, although we reiterate the point about looking for opportunities to look for overlaps and synergies with the indicators/data used to monitor and evaluate other linked strategies.

We have no further comments on the remaining questions.