

Email to: CCBill@gov.scot

22 September 2017

Dear Sir/Madam,

Consultation on the Climate Change Bill

The Royal Town Planning Institute (RTPI) is the champion of planning and the planning profession. We work to promote the art and science of planning for the public benefit. We have around 2,000 members in Scotland and a worldwide membership of over 24,000. We:

- support policy development to improve approaches to planning for the benefit of the public;
- maintain the professional standards of our members;
- support our members, and therefore the majority of the planning workforce, to have the skills and knowledge they need to deliver planning effectively;
- maintain high standards of planning education;
- develop and promote new thinking, ideas and approaches which can improve planning;
- support our membership to work with others who have a role in developing places in Scotland; and
- improve the understanding of planning and the planning system to policy makers, politicians, practitioners and the general public.

General Observations

RTPI Scotland welcomes this opportunity to comment on the Scottish Government's proposals for a Climate Change Bill. The RTPI is clear that climate change is the most important issue of our time, and welcomes the Scottish Government's commitment to ambitious targets for emissions reductions. We acknowledge that the scope of this consultation in particular is the framework for setting and measuring progress against emissions within the context of achieving the Paris Agreement goal of 1.5°C warming. It is important however to impress once again that to achieve the very ambitious emissions reductions targeted the Scottish Government will need to use the whole complement of public policy tools at its disposal. Crucially, this includes planning, which by helping to shape places that support sustainable decision making by people in their day to day lives, could help to mitigate some of the projected costs of cutting emissions, and associated impacts on vulnerable groups in particular. The New Urban Agenda, to which the United Kingdom is a signatory, provides a clear framework within which our towns and cities should develop as part of our efforts to reduce climate change causing emissions.

Target ambitions

RTPI Scotland supports the Scottish Government's ambition to achieve reductions in climate change causing emissions at the limit of what the Climate Change Committee believes is possible. Our expertise are not in climate science, but rather in the question of how we can help society adapt to both meet the new targets, and to mitigate the impacts of climate change that are now unavoidable. Nevertheless, within the limits of our knowledge we support the approach laid out in the consultation paper, and look forward to working with the Government and others to developing a Climate Change Plan that ensures that Scotland will fulfil its ambitions, and obligations, regarding climate change causing emissions. Please see our [evidence](#) submitted to the Scottish Parliament Local Government and Communities Committee regarding the draft Third Report on Policies and Proposals for more information about this.

Section 2 of the consultation paper addresses the principle of increasing Scotland's ambition for emissions reductions from 80% of 1990 baseline levels to 90% of baseline levels, and includes a summary of the Stern Review's analysis of the likely impact of this target on GDP. As part of this cost benefit analysis it is instructive to also consider how action to reduce emissions that focuses on influencing behaviour could result in places that deliver greater economic, environmental and social benefit. For example, enabling active travel as the primary means of transport in cities could also deliver public health objectives; reducing inactivity and incidences of disease associated with it, and therefore possibly making savings on healthcare costs. Planning in Scotland already has a number of tools at its disposal – not fully recognised in the draft Report on Policies and Proposals 3 - that can support the delivery of changes to our environment that include multifaceted benefits for society, the economy, and the natural world. These include:

- The National Planning Framework
- Scottish Planning Policy
- Strategic Development Plans – these are currently under review, although RTPI Scotland hopes that they will be replaced by an alternative tier of plans at the regional scale
- City Region Deals
- Local Development Plans
- Development Management, including conditions of consent and developer obligations

Impact assessments

RTPI Scotland welcomes the focus of the consultation paper on a 'Just Transition' to a low-carbon economy. To ensure that the impact on vulnerable groups of the adaptation required to cut emissions is minimised as far as possible, it will be essential to take a whole public policy approach. Creating places that are more sustainable in the round - not just in terms of reducing emissions, but also increasing accessibility to good employment, increasing opportunities for social interaction, and increasing access to high quality green space – will not just help Scotland to achieve its emissions targets, but could also help advance progress of a whole host of public policy goals. Planning is a crucial tool for shaping sustainable places in which to live and work, and we look forward to continuing to work with the Scottish Government to ensure that we make it easier for everyone to make sustainable behaviour choices in their day to day lives.

I trust that you will find these comments helpful. If you would like to discuss any aspect, or require clarification of any points raised, please contact me on 0131 229 9628 or by email to kate.houghton@rtpi.org.uk.

Yours sincerely

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

Kate Houghton
Policy and Practice Officer