Local Government and Communities Committee

The Draft Climate Change Plan (RPP3)

Submission from RTPI Scotland

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 2,200 members in Scotland and a worldwide membership of nearly 23,000. 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.

RTPI Scotland is grateful for the opportunity to provide written evidence for the Local Government and Communities committee as a part its scrutiny of the draft Climate Change Plan (third Report on Proposals and Policies - RPP3). The RTPI believes that climate change is the most important issue of our time and RPP3 identifies planning as ‘an enabling element of transformational change’. The focus of the policy outcomes identified in the document is however in harnessing technological advancement in vehicles and building fabric to deliver the necessary cuts to carbon emissions. In addition to this, RTPI Scotland urges the Government to consider how through positive placemaking planning can also influence behaviour change that impacts emissions. For example, by enabling more journeys on foot.

Planning – ‘an enabling element of transformational change’

RTPI Scotland welcomes the recognition of the role that planning can play in ensuring that decision-making takes into account the need to cut carbon emissions. RPP3 identifies local development plans, informed by the National Planning Framework, Scottish Planning Policy and Creating Places, as the site of policies which can ensure that new development contributes to reducing emissions. It is disappointing however that the document does not make explicit the connections from planning to wider local government decision-making, behaviour change, and the measurable policy outcomes included under each sector.
It is true that planning decisions should be taken in line with development plans which include ‘a presumption in favour of development that contributes to sustainable development’. The imperative to reduce carbon emissions is only one of the criteria included under an assessment of sustainable development, however. Also relevant, for example, would be the need for new housing, the need for development that supports economic growth, and potential flood risk. Planners must consider a huge range of issues when making a decision about whether new development would ‘contribute to sustainable development’. It is important that this complexity is recognised. The status of cutting emissions as a corporate priority of national and local government will help planners to attach weight to this issue in decision making.

The rest of our evidence is structured in two sections. The first makes connections between planning and the other ‘enabling element of transformational change’ identified in RPP3; behaviour change. The second section considers specific opportunities where planning is one of the key processes for delivering lower emissions, and suggests how the success of planning in delivering lower emissions can be measured.

**Behaviour change**

*Location, density and design of development*

RPP3 states that ‘...the most important decision the planning system makes is where development should be built’. As well as location planning can influence the density and design of development. When realised in developments together these three factors can enable people to make more sustainable choices in their day to day lives. Local development plans play a major role in delivering these criteria, and Scottish Planning Policy outlines a number of principles regarding which types of locations and development are generally considered ‘sustainable’. For example, there is a preference for developing previously-developed (‘brownfield’) sites before greenfield ones, and support for higher density development. Likewise, Scottish Planning Policy (paragraph 45) recognises the important role for design in making it easier for all people to move around a place by prioritising accessibility for people, not vehicles.

Planning development in this way can help to ensure that cities, towns and villages grow to accommodate and support a changing population sustainably. Walking, cycling and use of public transport can be made easier while private car journeys are discouraged by informing the density of development, its location, and how it is integrated into other land uses such as employment areas and schools. It is possible to measure changes in the form of the built environment delivered in this way, for example by monitoring changes in travel-to-work distances over time. It is disappointing that RPP3 anticipates having to cut emissions from vehicles via
promoting technological advances, based on the assumption that the number of
vehicle journeys made is going to increase. Travelling by vehicle not only has carbon
emissions and air quality consequences. For example, promoting active travel is an
important means of tackling the inactivity that contributes to poor health. And
removing cars from our towns and cities frees up space for people to use for social
and economic activities, potentially making our places more dynamic and
prosperous. It is therefore important to target cutting the need to travel by transport,
as well as cutting the emissions from those journeys that are essential.

RTPI Scotland supports a strong role for the planning system in promoting the
sustainable pattern of development described above. It is important to acknowledge
however that local development plans prepared by local government do not only
consider environmental sustainability when allocating sites for future development.
While development planning is a public function, delivery of the Local Development
Plan is largely the responsibility of the private sector. Sites allocated for development
therefore must have a strong likelihood of being capable of being delivered by the
market.

There are actions that can be taken by the government to try and ensure that the
best sites for development in sustainability terms are also deliverable for developers,
so called ‘market-making’. This can be done through site assembly, site remediation
and preparation and installation of supporting infrastructure, helping to overcome
some of the financial barriers to developing more complicated sites.

_Engaging communities_

As well as enabling behavioural change through planning for places that encourage
people to make sustainable choices, the planning system provides opportunities to
engage with communities, and potentially to conduct a conversation about climate
change.

The current Scottish Government consultation on the future of the planning system
proposes that existing community planning tools should be linked with stronger
community place planning tools. RTPI Scotland supports this. We suggest that the
processes for preparing community plans dealing with services, budgeting and
physical development could be a forum for conversation about the behavioural
changes, and the support needed to enable them, necessary for communities to cut
their carbon emissions.

_Delivering the policy outcomes in RPP3 – the role for planning_

The delivery of many of the policy outcomes targeted in RPP3, for example
delivering energy efficiency in homes and creating low emissions zones in urban
areas, will demand input from planners. To ensure that these outcomes are delivered
on time and as efficiently as possible, it will therefore be important to include planners at the national, regional and local scale in relevant conversations and decision-making from the outset. RTPI Scotland has recently published its ‘gamechangers’ for the planning system in Scotland, which are relevant to the success of the implementation of RPP3 given the reasons above. One of these gamechangers is that planners should be more involved in corporate decision making, especially at the local authority level. Currently it can be the case that corporate decisions with consequences for the planning service are made without consultation of those with expertise about place and development. As a result, implementation of initiatives may be delayed or hindered. RTPI Scotland recommends that where relevant, the local, regional or national planning body that will be involved in the delivery of a policy outcome is included under the ‘Public sector partners’ column. This would emphasise the importance of including planners in early discussions.

Strategic planning

In Places, People and Planning the Scottish Government has confirmed that Strategic Development Plans will no longer be prepared. Instead, the Government proposes Stronger Regional Partnership working. Minimising and adapting to the consequences of climate change will demand cooperation across political boundaries to address issues that have a different geographical distribution, for example river basins and associated flooding trends, and the distribution of clean energy supplies. RTPI Scotland therefore recommends that a new regional approach is robust and demands cooperation between different local government areas, and other relevant local and national agencies. It will be important to ensure that in removing Strategic Development Plans the specialist expertise for considering larger than local issues is not lost.

Efficient decision making

The Scottish Government consultation on the future of the planning system proposes that Permitted Development Rights are extended to include development ‘which meets our wider commitment to reducing emissions that cause climate change’. RTPI Scotland supports this proposal, which if implemented we believe would support the achievement of several of the policy outcomes identified in RPP3.

Resourcing and Skills

To fulfil the role proscribed for the planning system in RPP3, and supported here in our evidence, planning authorities will need to be properly resourced with the necessary skills and supporting infrastructure. Resourcing, leadership and skills is a fundamental part of the current Scottish Government consultation on planning. We know that since 2010 there has been an almost 25% drop in the number of planners
employed in local government, and that in 2015/15 only 55% of the costs of processing planning applications were recovered. For planning to fulfil its potential as a transformational force in Scotland’s shift to being a low carbon country, it must have the resource that it needs. RTPI Scotland will continue to work with Scottish Government to develop ways of diversifying skills in the planning profession, and to promote best practice in planning for climate change.

Yours sincerely

Craig McLaren
Director