



# Stop Climate Chaos Scotland

Review of the Scottish Planning System

Response to Call for Evidence

November 2015

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## Summary

Stop Climate Chaos Scotland (SCCS) welcomes the opportunity to submit evidence for the review of the Scottish Planning System. The planning system is particularly important in tackling climate change, as it steers where we live and work, how we heat our homes, and how we travel. There is a need and opportunity to ensure that the planning system evolves to help ensure Scotland becomes a sustainable, low carbon place and meets its climate targets.

## About Stop Climate Chaos Scotland (SCCS)

SCCS is a diverse coalition of organisations campaigning together on climate change, including international development, faith and environment organisations, trade and student unions and community groups. We worked together to inform the debate around the Scottish Climate Change Act 2009 ('the Climate Act'), and since then have continued our engagement to ensure that Scotland meets its ambitious, but necessary emissions targets.

## The role of planning in delivering low carbon places

The Scottish Parliament has made it clear that in 20-30 years Scotland will be a country with significantly reduced emissions, setting an example to the rest of the world in how we can tackle the global threat of climate change.

There are needs and opportunities for the planning system to support this national movement by helping to ensure Scotland becomes a sustainable, low carbon place. This is central to over-arching Scottish Government planning policy. The third National Planning Framework, published in 2014, sets out a vision for a Scotland which is "a low carbon place", with a "growing low carbon economy".

Planning priorities need to be consistent with this vision, and with wider government plans to support delivery of climate targets, such as the Second Report on Proposals and Policies (RPP2) and forthcoming RPP3. The planning system must also steer decision-making that avoids locking us into high emissions pathways.

The call for evidence states that this review aims to identify "*scope for further reform with a focus on delivering a quicker, more accessible and efficient planning process, in particular increasing delivery of high quality housing developments*". Whilst we support the principle of an accessible, efficient planning system, we are concerned that the review panel has not been given a clear steer that the planning system must, above all, support sustainable development, including delivery of legally binding climate targets.

Planning steers where we live and work, how we heat our homes, and how we travel. We know for example that building more roads, airport expansion and out of town shopping centres encourage high carbon behaviours, whereas low carbon homes, sited near workplace hubs, with good public transport links promote low carbon behaviours.

**SCCS recommends that this review seeks to identify and maximise opportunities for the planning system to support delivery of Scotland's legally binding climate targets, and fulfil the Scottish Government's vision for a "low carbon place" set out in NPF3.**

## Development planning

Development plans play an important role in steering planning decisions, identifying opportunities for sustainable development and avoiding lock-in to high carbon infrastructure. Scotland is committed to binding climate targets at national level, and it is important that planning authorities ensure Local Development Plans (LDPs) play their part in delivering proportionate carbon savings in their area.

The review should look to ensure that development planning requires positive contributions to climate targets through promoting policies which:

- **encourage high standards of energy efficiency** in new developments including housing, in order to minimise carbon emissions from construction and use (lifecycle emissions)
- **promote green infrastructure and land-use** patterns that reduce the need to travel by car
- **encourage appropriately-sited renewable energy**, including community-owned renewables
- **help to identify potential energy networks** e.g. district heating areas
- **restrict high carbon development** which is likely to have a major negative impact on emissions
- **protect important carbon sinks** such as peatland habitats
- **support adaptation to impacts of climate change** e.g. through provision of green spaces, appropriate heating and cooling in buildings and sustainable drainage. Opportunities can be identified through Strategic Environmental Assessment at plan stages.

Local authorities are required to report on key emission sources under The Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Order 2015. SCCS recommends that Councils should produce periodic statements setting out how the implementation of LDPs and consent for major developments are likely to impact on their carbon emissions and contribute to national targets. In some instances, an increase in emissions will be inevitable from a new development, but it should be demonstrated how reductions will be delivered through alternative means. This requirement was supported by the Local Government and Regeneration Committee in its report on RPP2.

We also recommend that the role of strategic development planning in delivering emissions reductions is explored, for example through identifying large-scale opportunities for green infrastructure, or setting regional climate targets. Impacts of climate change will require work across local boundaries, on landscape or river catchment area scale. Strategic planning can also give communities real opportunities to take action on climate change by encouraging community-based development and participation in plan-making, helping them to benefit from green development.

## Delivering high quality, low carbon housing

NPF3 sets out a vision for Scotland where *“our built environment is more energy efficient”* and we *“live in high quality, vibrant and sustainable places”*. Energy efficiency is crucial to ensuring high quality low carbon homes. This is recognised by the Scottish Government through the designation of energy efficiency as a National Infrastructure Priority in June 2015. Clear policies for low carbon development can also support an efficient planning system by providing long-term direction of travel to industry.

Housing is responsible for a quarter of end use emissions in Scotland, and energy efficiency is an area which can significantly improve wellbeing through providing warmer homes and lower energy bills, helping to tackle fuel poverty, and reduce emissions. **Improving the energy efficiency of Scotland’s housing stock should be a priority for the planning system and this review.**

Planning authorities are required under the [Climate Act](#) to implement policies to reduce emissions from new buildings. Section 72 of the Climate Act also states that planning authorities must include policies in their LDPs to encourage installation of low and zero-carbon generating technologies (LZCGT). ClimateXChange commissioned a study of how effective these policies have been, and an interim report was published in September 2015 with a number of recommendations for improvements:

- Strategic planning to improve integration between policy, land allocation, scale of development and sustainability responses. For example, in local authorities with large requirements for inner city affordable housing, policies to encourage combined heat and power and heat networks
- Planning requirements for minimum standards above that of the Scottish Technical Standards e.g. Bronze Active, Silver, Silver Active
- Use of checklists to show how housing design has been optimised for emissions reductions
- Requirements for pre-planning discussions to ensure compliance with low carbon policies

SCCS recommends that the outcomes of this research are considered in this review. In particular, it is important that planning systems support and build on, rather than duplicate, existing building regulations. It is also worth noting that whilst planning policies on energy efficiency of housing often (understandably) focus on new buildings, the majority of our current housing will still be standing in 2050. Therefore, in order to improve quality of housing as a whole, it is critical to support improvements to current stock, for example by promoting heat networks and retrofitting insulation.

### Planning to support and encourage low carbon infrastructure

Putting in place the right infrastructure is central to ensuring Scotland meets its climate targets, and bold decisions on infrastructure could be ‘gamechangers’. We recommend that the review take into consideration outputs of the Low Carbon Infrastructure Taskforce, which brings together organisations from across the infrastructure lifecycle to inform Government thinking. Analysis for the Taskforce by Green Alliance, ‘Scotland’s Way Ahead’<sup>1</sup>, shows that Scotland is currently falling short of the global average minimum of public infrastructure investment (72%) required to keep within a 2 degree warming scenario. Scotland currently spends only 52% of its capital budget on low carbon infrastructure, suggesting a fundamental shift is necessary to reorient investment decisions.

The report finds that Scottish infrastructure planning is currently failing to support strong progress on a number of priorities. These include: energy efficiency, although the designation as a National Infrastructure Priority is welcome; demand side approaches; a systems approach to renewable heat; and emerging needs such as energy storage. The public sector has a critical role to play in investing in enabling infrastructure, supporting innovation and leveraging private funding. Jacobs has produced a long-list of potential low carbon infrastructure projects for the Taskforce, and a final shortlist will be announced in January 2016<sup>2</sup>. **SCCS recommends that the review panel considers opportunities for ‘gamechanging’ low carbon infrastructure and how such projects can be encouraged.**

Infrastructure planning should also seek to support the decarbonisation of travel, for example by requiring sustainable transport networks to be in place in conjunction with new housing. Good site selection at the plan-making stage is crucial. Transport is responsible for nearly a quarter of Scotland’s total emissions, and the majority of Scotland’s working population travel to work by car or van: 67% of commuters. As transport planning is naturally long-term, if we are to meet climate targets in the next five, 10 or 25 years, we need to make changes now.

For more information, please contact:

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 Stop Climate Chaos Scotland (SCCS) is a coalition of organisations campaigning on climate change, including environment, faith and development organisations, trade and student unions and community groups.  
**Stop Climate Chaos Scotland is a charity, registered in Scotland**

<sup>1</sup> [https://scotlands-way-ahead.s3.amazonaws.com/sites/55816da1126f04bc0100002/assets/55dd793f126f042e96000e1/Foundation\\_Report\\_1.pdf](https://scotlands-way-ahead.s3.amazonaws.com/sites/55816da1126f04bc0100002/assets/55dd793f126f042e96000e1/Foundation_Report_1.pdf)

<sup>2</sup> <https://scotlandswayahead.org.uk/news/tenprojectsreport>