

**4. The plan has eight themes covering different areas of climate change action.**

**How relevant are the themes in the action plan?**

All very relevant

**5. Are there any themes missing? Please list them below.**

Decentralised renewable energy generation

**6. Under each theme, we have listed our proposed actions. How ambitious and achievable are these actions?**

Achievable, but not ambitious enough.

**7. Please make suggestions on how we can improve the plan, including comments on what's missing.**

Given the recently announced ambitions of Scottish Government regarding zero carbon targets, there may be a need to reframe the strategy and make it more ambitious

**Climate Impacts, Risk and Adaptation** - The climate change risk assessment results may result in a difficult recommendation to decommission certain heritage assets as a result of the prioritisation process. Whilst RTPi Scotland are aware that this is a difficult choice, it may have to be dealt with directly with a clear and upfront wording.

**Energy and Carbon Management** – the inclusion of decentralised renewable energy, whilst mentioned in this action, is not prominent enough. This is key consideration when factoring in increased demand for electricity through low carbon heating and EV charging facilities. The consideration of what is deemed appropriate in terms of low carbon infrastructure may require further evaluation in the light of new zero carbon targets announced by Scottish Government.

**Active and Sustainable travel** – The wider benefit of Action 7 *“Improve visibility of visitor sites that are linked to the National Cycling Network and Local Authority cycle/walking networks. This could increase the potential for partnership working on regional walking and cycling routes and networks.”* and the internal benefit stated under Action 10 *“Potential for improved partnerships internally, and with organisations or Local Authorities who want to develop green networks, paths, etc”* are confusing in terms of which outcome they directly deal with and whether they should be an action, provide an internal or external benefit.

For example in action 10 the intent to increase accessibility and path networks, is a very different objective to improving landscape connectivity for wildlife for the purposes of enhancing biodiversity. Therefore the wider benefit of action 7 and internal benefit of Action 10 should be combined into a new action under the Sustainable Action theme recognising the key role HES sites should play in supporting wider active transport networks.

Whilst being explicit about EV charging infrastructure, a specific commitment to better cycling park infrastructure such as bike parking would be welcomed.

**Biodiversity** – In supporting the Climate Impacts, Risk and Adaptation outcome and biodiversity a specific reference to the promotion of Sustainable Urban Drainage schemes on HES sites, in particular blue/green infrastructure would be welcomed. Whilst improving resilience to changing rainfall and flooding patterns this would clearly signal intentions to provide wider benefits to society and deliver ambitions of improved biodiversity.

The general intention to improve existing maintenance regimes and safeguarding existing assets for biodiversity is welcomed however the intention to identify new opportunities to introduce green infrastructure across sites could be emphasised more strongly. For example grassland management could also include the active planting of carefully selected wildflower species in order to provide a greater, connect resource for pollinating insects – a scheme currently under way in London by Brent Council.

Skills - Whilst skills related to energy efficiency and climate change adaption related restoration were mentioned, with a big increase expected in workload, is a workforce strategy required to understand current and future skills gaps?

**8. How clearly does the plan express the role of HES in tackling climate change?**

Very clear

**9. How clear is the language and wording in the plan?**

Very clear

**10. If you have any documents, letters or other files that you would like to share with us for consideration, please upload them here.**

<https://www.rtpi.org.uk/media/3152143/Rising%20to%20the%20Climate%20Crisis.pdf>

[https://www.adaptationscotland.org.uk/application/files/5515/5808/7098/Adaptation\\_Scotland\\_PS\\_G\\_Handbook\\_FINAL.pdf](https://www.adaptationscotland.org.uk/application/files/5515/5808/7098/Adaptation_Scotland_PS_G_Handbook_FINAL.pdf)

[https://www.changeworks.org.uk/sites/default/files/Renewable\\_Heritage.pdf](https://www.changeworks.org.uk/sites/default/files/Renewable_Heritage.pdf)

<https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=fd66dbe5-2b88-4acf-b927-256a82db9abe>

[https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2019/01/11689\\_LI\\_SuDS-Report\\_v4a-Web.pdf](https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2019/01/11689_LI_SuDS-Report_v4a-Web.pdf)

**11. If you have any other comments on the CCEAP, please share them with us.**

The place principle requests that all those responsible for providing services and looking after assets in a place need to work and plan together, and with local communities, to improve the lives of people, support inclusive growth and create more successful places. Therefore RTPi Scotland would encourage the specific reference to the place principle within the HES Climate Change and Environmental Action plan.