Friends of the Earth Scotland evidence on the Proposed Third National Planning Framework for Scotland to the Scottish Parliament Economy, Energy and Tourism Committee

30 January 2014

NPF and SPP process

We welcome the Scottish Government's decision to synchronise the National Planning Framework (NPF) 3 and Scottish Planning Policy (SPP) 2 consultation processes and recognition that the obligatory NPF Parliamentary scrutiny process might helpfully influence SPP. Therefore, where relevant, we comment on both documents in this evidence.

We note that the differences between the NPF3 Main Issues Report (MIR) published for consultation in April 2013 and the draft laid before Parliament in January 2014 are considerable and make scrutiny of the framework even more challenging for both stakeholders and MSPs in the context of the extremely limited 60-day scrutiny period. We continue to question whether this timeframe is sufficient to adequately scrutinise a framework of such critical national importance.

We note the continued difficulties in ensuring thorough and genuine engagement with communities in the development of the NPF, especially those in the vicinity of national designations. In particular, in regard to the inclusion of developments located 'throughout Scotland' it is not clear what influence designation in NPF has later in the planning process. Further, the Government appears not to have learned from the experience of NPF2 in which the late inclusion of national designations, combined with inadequate consultation processes, resulted in a lengthy and costly legal challenge.

The Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters, and the European Public Participation Directive (PPD), both of which the Scottish Government is obligated to implement, require effective participation in decision-making by individuals, communities and NGOs in order to increase accountability and transparency. We consider the NPF process and the planning system as a whole should be reviewed in the context of Aarhus compliance.

We have had sight of Planning Democracy's evidence to the Local Government and Regeneration Committee which raises important points regarding the continued inadequacy of the NPF consultation process, and the planning system in general, and recommend all Committees consider this in the context of their particular remits.

Engagement

We strongly support the section on engagement in the draft SPP2, but consider it could be strengthened by further emphasising the importance of in-depth engagement with communities, particularly in relation to local development plans. Aarhus Convention compliance should be reflected in the policy principles. While we agree that speedy decision-making is important for both developers and communities, it should not be at the cost of good decision-making processes. A specialist environmental court or tribunal (which the present Government is committed to consulting on) could help to create a fairer and speedier system in deciding planning appeals.

We also note the importance of rights of appeal as a crucial part of the mix in any healthy, functioning planning system. The Scottish Committee on Administrative Justice and Tribunals Council has found there

to be an 'appellate deficit' in the context of citizens ability to challenge planning decisions, and recommend an independent planning tribunal be set up to hear appeals from 'routine' planning decisions.[1]

We note the draft NPF points to the Community Empowerment Bill as a means of strengthening communities' "opportunities to have their voices heard in decisions that affect them and their local area". We support the extension of the right to buy to communities in all parts of Scotland, but consider the definition of community in both the Bill and planning policy should include communities of interest. For example, in the context of community energy, a geographically situated community, particularly one that is small in size, might not be able to raise sufficient funds from within. If set up as a co-operative, the local community could decide to raise funds through a share offer that extends to a wider community of interest. Whilst co-operatives generally favour the local community, the majority in such an instance could come from outside the geographically-defined parameters of 'local'.

Sustainable Development and Sustainable Economic Growth

We are concerned that both the NPF and the SPP place too much emphasis on economic growth. While it is welcome that both the draft SPP and proposed NPF state Government's central purpose in full: "to make Scotland a more successful country, with opportunities for all to flourish through increasing sustainable economic growth," rather than the misleading abbreviation "increasing sustainable economic growth", we note that economic growth is one of many means to the goal of flourishing, and not an end in itself, and this should be reflected in both the Government's central purpose and the planning policies currently under scrutiny.

Our long-term wellbeing and prosperity is underpinned by a broad range of factors including, very importantly, a healthy and safe environment. However, on a finite planet in a resource- and carbon-constrained world, it is both a strategic priority and a moral duty to ensure that Scotland does not exceed its fair share of the earth's ecological resources – with respect to both intra- and inter- generational environmental justice – particularly given the historical ecological debt we owe. Planning policy has a key role to play in achieving this, and therefore the SPP and NPF must recognise these constraints. While planning policy, of course, has to take account of economic policy, the pursuit of economic growth must not override environmental protection and improvement and more judicious use of natural resources.

We welcomed the Government's supplementary consultation on Sustainability and Planning as an effort to address some of these concerns, and in particular we support the inclusion of a clear and internationally recognised definition of sustainable development in the SPP, as well as the clear commitment to continued support for the UK shared framework for sustainable development, including the need to live within environmental limits. However the use of the term "sustainable economic growth" remains a key concern since it can easily be taken to mean "continued economic growth" without reference to societal and environmental impacts, and we think the best approach is simply to remove the term from both documents and replace it with "sustainable development."

Climate and energy

We welcome the emphasis on delivering a low-carbon Scotland and on meeting our climate targets in both the SPP and NPF. However NPF3 fails to deliver on these commitments in a number of areas, particularly transport, and SPP does not reflect the urgency of the need to decarbonise throughout the subject sections. The planning system must aim to reduce the need to travel in the first place, promote energy efficient buildings, and prioritise protection and enhancement of key habitats both in relation to mitigation and adaptation. The set of national developments cannot be reconciled with Scotland's climate change targets. While we welcome the commitments on walking and cycling, and the removal of national development status from the Hunterston power station, we strongly oppose the inclusion of capacity-enhancing airport developments as national developments.

Scotland needs to rapidly decarbonise our energy supply. This means reducing demand, increasing efficiency, switching to renewables and, as the last strategy, decarbonising fossil fuel use. Research by

[1] Scottish Committee on Administrative Justice and Tribunals Council 'Right to appeal: a review of decisions made by Scottish public bodies where there is no right of appeal or where the appeal procedure is inaccessible or inappropriate.' 2012

leading renewable energy consultants Garrard Hassan demonstrates that Scotland can phase out all fossil fuel and nuclear power by 2030, maintain a secure supply and generate additional electricity for export.[2]

Therefore, and given the several false starts so far in getting CCS operating in Scotland, Peterhead and Grangemouth should only be included as national developments if sufficiently robust timescales and CCS efficiencies are included and enforced. For instance for the Grangemouth proposal the plant should be fully covered by CCS from day one of operation and should only be allowed to run if it achieves at least 90% carbon capture. Cockenzie should not be classified as a national development unless a similar guarantee is given that it will be built with CCS.

We support the continued inclusion of the high-voltage electricity transmission network, and welcome the addition of pumped hydroelectric storage across Scotland as a necessary path to de-carbonisation, however we are concerned about the way in which this latter designation was added post-MIR consultation (see comments on NPF and SPP Process above).

Heat

Switching to renewable heat, and using heat more effectively are key issues in creating a low carbon Scotland. Scotland is currently ahead of the curve on meeting the 11% renewable heat target for 2020. This target should be reviewed with a view to increasing it. We support the Government's current stated policy in the Electricity Generation Policy Statement to make the most efficient use of biomass for heat and to prioritise small-scale use of locally sourced biomass, off the gas grid. This can have particular benefits in rural areas. However the current proposals by Forth Energy (approved by the Government for Grangemouth and Rosyth) are directly contrary to this policy, being medium-scale, fuelled by wood from overseas, and primarily intended to generate electricity for the National Grid in urban areas at low levels of efficiency, and with no guarantees that any waste heat will be put to any useful purpose. They will add significantly to carbon emissions for several decades at least, and so undermine the prospect of achieving Scotland's emission reduction targets. Additionally, given the international environmental and social consequences of importing vast quantities of timber, and the absurdity of burning this fuel inefficiently for electricity, even the abatement of emissions from such biomass power stations would not make them sustainable. We are pleased that there is no mention of the Forth Energy proposals, or large-scale use of biomass for electricity production, in NPF3.

Recent experience in Scotland suggests that the CHP option is often discarded in favour of standard fossil fuel heating on cost grounds and that heat generators are unwilling to take on the risk of gearing up to supply heat when their customers might cease to be interested in future. The planning system needs to do more to rebalance these decisions so that maximising the use of heat becomes the easy option or indeed the only option. Heat should be conserved and recycled in all developments, as in Scandinavia, and urban district heat grids can provide greater security of demand for generators.

Wildland and community renewables

We also support the aim to encourage more community and local ownership of renewables sources of both heat and electricity. The current Scottish Government 500MW target for community-and-locally-owned renewables by 2020 is welcome but Scotland is progressing very well and this target should be reviewed with a view to increasing it, and an ambitious target for 2030 set.

We recognise that it is important to consider wild land in the context of rural infrastructure development and that the SNH Map will provide valuable guidance to decision makers.

However, we suggest there is a need for special consideration for community-owned energy developments such as wind or hydro schemes in this context. The map should not become a rigid tool that enables those who do not reside locally to discriminate against rural communities who wish to decrease their dependence on fossil fuels and therefore accept renewable energy as part of *their* landscape.

[2] Power of Scotland Secured: Summary for Policy Makers and Options for Coping with High Renewables Penetration in Scotland http://www.foe-scotland.org.uk/power-secured

Unconventional gas

While it is welcome that the new draft Scottish Planning Policy (SPP) has removed any presumption in favour of unconventional gas that could have been read into the previous SPP, we note that the NPF3 suggests coalbed methane in the Central Belt could contribute to secure energy supplies in the medium term. Analysis by the Carbon Tracker Initiative shows that in order to have a reasonable chance of staying below 2°C warming, 80% of the world's proven fossil fuel reserves must not be burned unabated. In the context of the continued failure of CCS development, the latest climate science, our overabundance of fossil fuels and renewable resources, it is utterly irresponsible to pursue a new source of fossil fuel.

The impact of 'fugitive emissions' through leakage, in addition to flaring and venting has led scientists to argue that the climate impact of unconventional gas is greater than that of conventional natural gas, and some to suggest it could be as bad as coal. Methane is a much more powerful greenhouse gas than carbon dioxide, with a global warming impact 86 times that of carbon dioxide over 20 years, and 34 over 100 years, according to the latest IPCC report.[3] The important point with methane is that while it has a relatively short lifespan, its potency in the short term makes necessary overall greenhouse gas emissions reduction targets harder to meet. As with conventional oil and gas operations, leaks can occur at wellheads, pumps, pipelines and associated gas treatment infrastructure. Evidence from around the world indicates that a certain amount of leakage via these routes is practically inherent to the industry, and in theory, these sources of leakage can be identified and mitigated through monitoring and industry best practice to a greater or lesser extent. However, one of the key areas of contention in general, and specifically in relation to Dart Energy's current application, is the issue of methane migration leading to fugitive emissions through high permeability strata, faults and old coal mine working.[4]

Researchers from Princeton University and the Environmental Defence Fund calculate that if fugitive emissions are below about 3.2% of total well production then natural gas has a lower climate impact than coal.[5] The US EPA estimates that fugitive emissions are below this, but recent US monitoring suggests that fugitive emissions could be over 4% and up to 9% in some cases,[6] wiping out any climate advantages in comparison to coal. One recent Australian study found that coal seam gas might be nearly as high carbon as coal or electricity generation, with a leakage rate up to 4.38%.[7] A Queensland Government study found almost half the wells in coal seam gas fields in the Tara region to be leaking.[8] If shale gas does have lower climate impact than coal, then any climate benefit depends on shale gas being burned instead of coal. The industry points to shale gas replacing coal in the US helping cut carbon emissions, but analysis from the Tyndall Centre shows that much of the coal not used in the US was exported, meaning that half the emissions benefit was lost. Coal use for electricity generation in the UK rose from 22.9% in the 3rd quarter of 2011 to 35.4% in the 3rd quarter of 2012.[9] In a world with a growing demand for energy, and without a global climate deal, shale gas will probably be used as well as coal.

The UK Government's relentless pursuit of the shale gas industry includes offering tax breaks to onshore unconventional gas operators, which will of course be open to any companies taking up licenses in Scotland. DECC plan to tender for the 14th round of onshore oil and gas licensing in Autumn 2014, when a vast swathe of central and southern Scotland will be offered for shale gas and coalbed methane exploitation. We welcome the Scottish Government's more cautious approach to the industry, but consider that in the context of our climate obligations and because oil and gas licensing is reserved to Westminster it

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[3] IPCC Working Group 1, Fifth Assessment Report, 2013. 20 and 100 years are commonly used timescales for calculating the carbon dioxide equivalent of other greenhouse gases.

[4] Joint Statement of Common Understanding between Falkirk Council and Stirling Council (of the first part) and Dart Energy (Forth Valley) Limited (of the second part) regarding the matters on which the parties are agreed in relation to the appealed applications for planning permission to construct a coal bed methane ("CBM") production facility at Letham Moss and Powdrake Farm near Falkirk, 17 December 2013

[5] Alvarez, Pacala et al, Feb 2012 Greater focus needed on methane leakage from natural gas infrastructure, http://www.pnas.org/content/109/17/6435.full

[6] Nature, 2nd January 2013 'Methane leaks erode green credentials of natural gas' http://www.nature.com/news/methane-leaks-erode-green-credentials-of-natural-gas-1.12123, Howarth and Ingraffea, Methane and the greenhouse-gas footprint of natural gas from shale formations, Cornell University http://www.sustainablefuture.cornell.edu/news/attachments/Howarth-EtAl-2011.pdf, & Venting and Leaking of Methane from Shale Gas Development: Response to Cathles et al. 2012 http://www.eeb.cornell.edu/howarth/Howarthetal2012_Final.pdf

[7] Hardisty, P. E., Clark, T. S., Hynes, R. G., 2012. 'Life Cycle Greenhouse Gas Emissions from Electricity Generation: A Comparative Analysis of Australian Energy Sources.' Energies 5, 872897

[8] Queensland Government Investigation Report 2010, Leakage testing of coal seam gas wells in the Tara 'rural residential estates' vicinity http://mines.industry.qld.gov.au/assets/petroleum-pdf/tara_leaking_well_investigation_report.pdf

[9] DECC 'Energy Trends December 2012' Section 5 https://www.gov.uk/government/uploads/system/uploads/attachmentdata/file/65835/3945-energy-trends-section-4-electricity.pdf

should take decisive action and use devolved planning powers to implement an immediate ban on these new sources of fossil fuels.

We note that the Scottish Government's position statement has adopted erroneous language from the independent analysis of responses to the SPP in relation to input on unconventional gas extraction. The statement under Key Issue 9 that "A campaign comprising 364 responses and a petition of 245 signatures opposed the potential extraction of coal bed methane by hydraulic fracturing (fracking)" misrepresents what the petition called for and campaign responses[10] said. Neither mentioned hydraulic fracturing (commonly referred to as fracking) but rather call for 'a ban on the unconventional gas industry' and buffer zones 'between communities and onshore gas drilling sites.'

'Fracking' is often used interchangeably with shale as extraction of that gas always requires the use of hydraulic fracturing. However it is also used (conveniently but inaccurately) to cover unconventional gas extraction as a whole as short hand for 'unconventional gas extraction including shale and tight gas fracking, and coalbed methane extraction by methods including de-watering and / or fracking'. Current proposals for coalbed methane extraction in Scotland do not involve fracking, but plan to release the gas by de-pressurising coal through pumping water out of the seams. However, the industry in Australia estimates that up to 40% of coalbed methane wells end up needing to be fracked as pressure drops and gas flow declines.

It is important to note that the key environmental and health risks of coalbed methane extraction apply whether or not hydraulic fracturing takes place. Drilling for coalbed methane carries the risk of mobilising naturally occurring chemicals and leaving introduced chemicals behind deep underground from where they can migrate into and contaminate soil, water and air. The authors of a study from Cornell University warn that the gas boom is an uncontrolled health experiment on an enormous scale and make a plea for badly needed research on the likelihood and impact of these chemicals entering the food chain via animal products.[11]

We note that while there is a lack of peer reviewed studies into the health impacts of unconventional gas extraction and specifically regarding coalbed methane extraction, indicative findings point to potentially very serious public health impacts for communities living in and near gas fields. While studies often fail to distinguish between the impacts of drilling and fracking chemicals on human health, a recent peer-reviewed study found that non-methane hydrocarbon emissions from unconventional gas sites were higher during drilling stages than during fracking stages[12], hence key public health concerns apply to coalbed methane operations whether or not they are fracked, as much as they do to shale gas developments.

The study found polycyclic aromatic hydrocarbons (PAHs) – naturally occurring in coal –in air samples taken at a fixed sampling station near a natural gas well pad that used a closed loop system in Colorado.[13] Sixteen directional wells were drilled and fracked during the study period, however samples of PAHs were highest during drilling stages. The health effects of exposure to these chemicals can include impact on: skin, eye and sensory organ; respiratory system; gastrointestinal; brain and nervous system; immune system; kidney function; cardiovascular and blood; cancer, tumorgenesis; genotoxic; endocrine system; liver and metabolic. The same study also detected a large number of volatile organic compounds including high levels of methane and methylene chloride. Communities living near gas fields in Australia complain of respiratory problems, rashes and irritated eyes. An investigation by a concerned GP in early 2013 of 38 households in close proximity to coalbed methane wells in Tara, Queensland, found that 58% of residents reported definite adverse health effects related to gas drilling and a further 19% were uncertain.[14] Symptoms include breathing difficulties, rashes, joint and muscle pains, nausea and vomiting, and spontaneous nosebleeds, and are consistent with exposure to naturally occurring and common drilling and fracking chemicals in the unconventional gas industry.[15] A working paper from Cornell University suggests that air and water pollution from unconventional gas activities can have a profoundly damaging effect on

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[10] http://www.scotland.gov.uk/Resource/0043/00431251.pdf and http://www.scotland.gov.uk/Resource/0043/00431648.pdf

[11] Bamberger and Oswald, Impacts of Gas Drilling on Human and Animal Health, 2012, *NEW SOLUTIONS: A Journal of Environmental and Occupational Health Policy* http://baywood.metapress.com/link.asp?id=661442p346j5387t

[12] Colburn et al, An Exploratory Study of Air Quality near Natural Gas Operations, 2012 http://endocrinedisruption.org/assets/media/documents/HERA12-137NGAirQualityManuscriptforwebwithfigures.pdf

[13] Ibid

[14] Symptomatology of a gas field - An independent health survey in the Tara rural residential estates and environs, Geralyn McCarron, April 2013 http://d3n8a8pro7vhmx.cloudfront.net/lockthegate/pages/49/attachments/original/1367333672/2013-04-symptomatology_of_a_gas_field_Geralyn_McCarron.pdf?1367333672

[15] Colburn et al, 2012

infant health. The study looked at birth weight outcomes in pregnant mothers living within 2.5 km of a gas well and found that the incidence of low birth weight increased by 25%.[16] A subsequent study building on this work by examining birth record in Pennsylvania between 2004-2011 (but yet to be peer-reviewed) backs up the Cornell findings, and finds that the risk of low-birth weight is doubled in infants born within a 2.5km radius of gas drilling sites.[17]

These concerns have led to over 20 bans and moratoria around the world, including a ban on all coalbed methane drilling within 2km of communities and sensitive industries in New South Wales, Australia. We feel strongly that the precautionary principle, to which the Scottish Government is bound under international treaties, applies to the unconventional gas industry which to date has failed to demonstrate that it is safe for the environment and human health (in the face of mounting evidence to the contrary) and call on the Scottish Government and Parliament to lead the way within the UK by implementing a ban on all unconventional gas extraction.

However, the draft SPP2 is an improvement in terms of the guidelines it provides for local authorities. In particular we note the introduction of buffer zones between sites and communities, which applies to all extractive industries. The Scottish Government has confirmed its intention to ensure that this requirement remains in the final SPP.

We support the inclusion of buffer zones for unconventional gas extraction in SPP but wish to make the following points:

- Buffer zones can help to protect communities from the very worst of the local environmental and health impacts of unconventional gas extraction, but they will do nothing to mitigate against the climate impacts, therefore we still consider a ban is necessary.
- It is critical that SPP specifies how buffer zones will be designated, otherwise communities across central Scotland face a postcode lottery as to whether they will be afforded actual or tokenistic protection.
- An emerging body of research indicates that the worst public health impacts are identifiable within 2km of gas extraction sites, therefore we consider that SPP should require buffer zones of at least 2km from all above and below ground activity between dwellings, ecologically sensitive areas and sensitive industries. We note the SPP proposes a buffer distance of 2.5km for windfarms.
- In New South Wales 2km Coal Seam Gas Exclusion Zones now cover 5.3 million hectares and protect communities and sensitive industries. An extension of this system protects areas which might be developed for housing in future. 95% of dwellings in NSW are now protected from CSG exploration and development.[18,19]
- We note that because the unconventional gas resource in Scotland is located in the most populace part of the country it is likely that such a restriction would make the unconventional gas industry unviable.

Further, we consider that should any unconventional fossil fuel production be consented in Scotland, full restoration and protection of the environment after operations are finished are key issues to be discussed and agreed before any planning permission is granted. As well as the usual issues of removing surface installations, for a novel industry like unconventional gas, there are some important extra safeguards required, including the need for long-term monitoring and management of any pollution which may make its way to the surface or into water course long after the developer has left.

The Petroleum Act 1998 under which onshore licenses are issued contains no requirement to restore the site nor any provision for aftercare. Nothing in the Act or the licences explicitly require operators to prove that they have the resources to carry out restoration or aftercare activities. To use a current example, Dart Energy – the operators behind current proposals for commercial coalbed methane at Airth – have not had to prove that they can afford to fund a restoration and aftercare programme and DECC granted the PEDL licence before any discussions between Dart Energy and the local authorities could have established the

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[16] Elaine L. Hill 'Shale Gas Development and Infant Health: Evidence from Pennsylvania' Working Paper Revision December 2013, Cornell University http://dyson.cornell.edu/research/researchpdf/wp/2012/Cornell-Dyson-wp1212.pdf

[17] The study is yet to be published online, but was presented to the American Economic Association in Philadelphia on 4 January 2014 by authors Janet Currie of Princeton University, Katherine Meckel of Columbia University, and John Deutch and Michael Greenstone of the Massachusetts Institute of Technology
http://www.bloomberg.com/news/2014-01-04/study-shows-fracking-is-bad-for-babies.html

[18] http://www.planning.nsw.gov.au/coal-seam-gas-exclusion-zones

[19] http://www.planning.nsw.gov.au/DesktopModules/MediaCentre/getdocument.aspx?mid=1595

necessary extent, and therefore cost, of restoration and aftercare. When Dart took over PEDL133 from Composite Energy their share price was about AUS$1, at the time of writing it is 14 Australian cents.

In light of the current opencast coal mine restoration bond debacle, SPP and NPF must take a more robust approach to restoration bonds. It must be made clear that planning authorities must not grant consent for any new development which requires ongoing mitigation or restoration until the finance for that mitigation and restoration is fully in place. Before granting consent, planning authorities must also have in place a system of monitoring and enforcing not only of activity on site but also the value of the bonds so that operations can be ceased immediately at any point if the value of any bonds falls below what would be required to deliver full restoration. The current situation, where many opencast coal mine sites, including some within internationally protected wildlife sites, now require significant external and possibly public funding, in order for restoration obligations to be fulfilled is disgraceful.

This has been one of the biggest failings of the planning system and local planning authorities in recent years and the final SPP must help ensure a similar situation can not arise in future in this or other industries.

Air pollution

It is almost incredible that the SPP hardly mentions air quality, despite the Strategic Environmental Assessment stressing the key role planning needs to play and given the need to meet EU, UK and Scottish air quality objectives and standards, currently widely breached in Scotland's large urban areas. Air Quality Management Areas are a significant constraint on road-based development and the planning system is the main tool by which local authorities can address the air pollution problems which cause their designation, yet they are not mentioned.

Air pollution remains a challenge for Scotland, with levels of pollution in many urban areas higher than legally binding limits which were supposed to be met in 2005 and 2010. Local Authorities bear the burden of solving air quality issues through the Local Air Quality Management system; yet some factors which have adverse impacts on air quality are outwith their control. It is vital that the SPP and NPF3 play their part in tackling air quality issues.

The SEA recognises air quality as a key issue, and the Minister for Local Government and Planning stated in Parliament on Sept 19th 2013 (S4W-17014) that the planning system has a key role to play in ensuring that air quality objectives are achieved. SPP and NPF3 however fail to deal with air quality directly. We would suggest the following inclusions:

- SPP should include reference to air quality and the need to meet air quality targets within the delivery points of the Sustainable Development heading. This is because this heading is supposed to deliver a health society, and air pollution is one of Scotland's biggest killers, killing over 1500 people each year;
- SPP should include the need for all developments to take into account air quality objectives, especially in the section which deals with development planning and transport. This is because the SEA acknowledges that the majority of air pollution comes from traffic.

The Key Documents section should include the Air Quality Strategy for England, Scotland, Wales and Northern Ireland. The Delivery section should refer to air quality standards and objectives and to the Air Quality Management Area designations, and strongly encourage planners to use the planning system to address air pollution problems including preventing development which would make pollution problems worse.

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