



Friends of the Earth Scotland Policy Briefing: National Planning Framework

2nd March 2009

Introduction

Planning is boring, until you have a proposal for a major road or a power station at the end of your street. The planning system needs to enable sustainable development while recognising that people will not normally engage in the process until there are real proposals on the table.

While we welcome much of what is in the National Planning Framework, we are not surprised that the Local Government and Communities Committee has raised concerns about the quality of the engagement and consultation processes undertaken, nor felt able to give proper scrutiny to the detail of the policies and national developments included in the draft.

For these reasons, and in order to ensure national developments genuinely help deliver national objectives and priorities, ***Friends of the Earth Scotland recommends that Parliament should propose – in the strongest possible terms – that status as a national development should not exclude such developments from full scrutiny of need by way of a public inquiry.***

We have concerns about several of the national developments, but two raise major potential conflicts with our climate change targets and commitments to sustainable economic development. These are power stations and airport enhancement.

Power stations

The NPF includes a power station development at Hunterston and 'new non-nuclear baseload capacity at existing generation sites'. The policies and language of the NPF would permit construction of new unabated coal-fired power stations, adding significantly to carbon dioxide emissions. As confirmed by James Hansen in his open letter to the First Minister¹, the NPF's commitment to 'carbon-capture readiness' is meaningless, allowing unabated emissions in the interim. Worse, by taking up grid and market capacity, the presence of such 'carbon-capture ready' plant would act as an economic disincentive to developers wishing to demonstrate operational carbon capture and storage from the outset. Additional generation capacity is not needed so urgently that unenforceable rules for carbon capture readiness are appropriate².

New coal power capacity at Longannet, Cockerzie, Hunterston and Peterhead must feature fully operational carbon capture and storage technology from the outset or be refused planning permission. Such plants should not therefore be designated as of national need. Instead the NPF should establish the principle of a strictly enforceable emissions performance standard (EPS) for new combustion plant. An EPS would set the maximum allowable level of CO₂ emissions per unit of electricity or heat generated by new fossil-fired plant. This would help deliver our climate targets and ensure Scotland genuinely took a lead in the global development of carbon capture and storage in the coming decade, not wait to import it from China in the 2020s. In the UK the Conservative and Liberal Democrat parties both support an emissions performance standard approach³.

1 Available online at: <http://thescotsman.scotsman.com/latestnews/In-full-Letter-to-the.4932922.jp>

2 The energy consultancy Poyry conclude that additional replacement generation capacity is not needed before the 2020s if UK government renewables and efficiency targets are met. http://www.wwf.org.uk/filelibrary/pdf/energy_gap_summary.pdf

3 See for example 'The Low Carbon economy – Security, Stability and Green Growth', Conservative Party Green Paper (January, 2009); and Charles Kennedy's private members bill, online at: <http://services.parliament.uk/bills/2008-09/industrialcarbonemissionstargets.html>

Some have argued that new nuclear capacity would benefit Scotland and should not be ruled out by the NPF. However new nuclear would create the same disincentives as unabated coal, with the additional disadvantages that it would undermine our renewable energy development (which needs improved energy storage and 'load-following' thermal plant to complement it, rather than inflexible baseload nuclear). Friends of the Earth Scotland therefore strongly supports the ruling out of a nuclear option, while using a tough emissions performance standard (as used by California) to stimulate the best technologies for cutting emissions from fossil fired plant.

- ***FoES recommendation - the specific proposals for new 'capture ready' coal-fired power stations be removed from the NPF, unless they are amended to meet an emissions performance standard of no more than 350 grams per kilowatt hour***
- ***FoES recommendation - The NPF should establish a moratorium on new fossil-fired power stations that do not meet such an emissions performance standard; and continue to rule out new nuclear power stations***

Airport enhancements

Regarding airports, the NPF expresses enthusiasm about increasing international connectivity and includes airport enhancements designed to enable increased passenger and freight movements as national developments. The NPF suggests that growth at Scotland's international airports will be facilitated through a mix of access enhancements and surface measures such as new taxiways and hangar facilities. In the last decade 85% growth in air travel has driven 131% increases in emissions from the sector in Scotland⁴. At the same time it has increased the net loss to Scotland's economy that arises because Scots flying overseas spend more there than incoming visitors spend here⁵.

Such continued growth cannot be mitigated by cleaner aircraft, and is clearly unsustainable, especially given that other emissions from aircraft at altitude magnify the impacts of aviation emissions on climate change by 2-4 times. Using the NPF to designate measures to increase air travel as a national need therefore sends entirely the wrong message.

- ***FoES recommendation - airport enhancement projects be removed from the NPF***

Conclusion

There is much to welcome in the principles and content of the new statutory NPF. However several specific elements – notably power stations and airports - and therefore the package as a whole - fail to pass the test of contributing to sustainable development and supporting the delivery of Scotland's climate targets. Moreover, shortcomings in the consultation and engagement procedures mean the NPF cannot command the public's support. These proposals should still be subjected to full scrutiny of need and sustainability at public inquiry.

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4 Thomas, J. and Thistlethwaite, G., International Aviation and Shipping Emissions, 1990-2006, Report to the Department for Environment, Food and Rural Affairs, The Scottish Government, The Welsh Assembly Government and The Northern Ireland Department of Environment, AEA., available from: http://www.naei.org.uk/report_link.php?report_id=534

5 <http://www.dft.gov.uk/consultations/archive/2002/fd/scot/mc/chapter9otherkeypolicyissues1516> - para 9.1.17 notes annual tourism receipts from inbound passengers were £0.5bn in 2000, and the comparative figures for outbound expenditure by Scots travelling abroad was £0.7bn.



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