

Draft National Planning Framework 2

A response by Friends of the Earth Scotland

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1. Introduction

Friends of the Earth Scotland is an independent member of the Friends of the Earth International network. We undertake research, advocacy and campaigning activities throughout Scotland in pursuit of positive solutions to the challenge of climate change.

Friends of the Earth Scotland welcomes debate on the Draft National Planning Framework 2 and the strategic long-term development of Scotland, as decisions made today will have lasting and often irreversible impacts. Friends of the Earth Scotland continues to support the statutory status given to the NPF as a strong guide to both local authorities and developers, however we remain concerned about the robustness of the scrutiny process.

2. Key Comments

2.1 Climate change imperative

The IPCC 4th assessment and an analysis of the UK's emissions trajectories shows that emissions must be brought onto a rapid downward trajectory within the next decade if climate change targets are to be met - the period covered by NPF2 is therefore critical. The current NPF2 draft fails to reflect this reality and will therefore not:

- Deliver *sustainable* economic growth
- Achieve climate change targets and enhance the quality of the natural and built environment
- Promote a better quality of life
- Contribute to a smarter Scotland, since it will fail to establish Scotland as a centre for low carbon technologies.

Our assessment of the NPF2's content reveals a set of proposals that whilst strong on rhetoric fall short in terms of delivery of a low carbon economy. Worse still, certain elements of the NPF2 are counterproductive in terms of emissions reductions, most notably planning for transport infrastructure. In Friends of the Earth Scotland's view, the NPF must give a much clearer and firmer statement of intent with regard to emissions reductions and provide a guide to specific developments of an appropriate nature.

2.2 Transport objectives versus climate change objectives

This is the principal area of weakness within the proposal and an issue where the NPF2 shows the greatest contradictions. We welcome the recognition that climate change is one of Scotland's 'principal challenges' in sustainable development (p82). Acknowledgment of

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Scotland's target for an 80% reduction in emissions by 2050 is also notable as it puts Scotland broadly in line with the global efforts needed to tackle climate change. This means that Scotland must make immediate and sustained reductions across all sectors, including transport, so that aggregate emissions are 20% of 1990 levels by 2050. No sector should be exempted or afforded special treatment.

As the fastest growing contributor to emissions (p116) transport policy must be a key part of the '*strategy for achieving a substantial reduction in emissions*' under a Greener Scotland (p145). We welcome the importance given to key locational decisions and transport infrastructure investment that will help to move us towards a more sustainable, low carbon economy (p 115). We also welcome the statement that reducing emissions in the immediate and long term is an important driver for transport policy (p117). However, throughout the NPF2 Draft there is a tension between commitments to tackle climate change and the planned expansion of travel and transport facilities, in particular air and road travel. The SEA of the NPF recognises that any emissions benefits from relieving congestion will only be short term, and that expansion of capacity will increase emissions overall. In addition many of these projects are not compatible with the principles underpinning the Government's Sustainable Development Strategy. Nor do the key projects consistently help meet strategic outcomes to reduce emissions and to give people a choice of public transport in the National Transport Strategy (p 193). These tensions are recognised in terms of air travel (p119), yet apparently ignored.

We believe that the only solution to this tension is using the NPF to promote only projects that support sustainable transport choices and rejecting projects that increase emissions. In particular Friends of the Earth Scotland believes that the National Planning Framework will fail to deliver key environmental objectives unless Glasgow and Edinburgh airport expansion plans are removed and support for the second Forth Road Bridge is dropped. The other national developments fall far short of compensating for the damage done by these projects, and indeed in some cases further risk locking Scotland into fossil fuel dependency for the coming decades in an economic climate where volatile fuel prices are expected and a peak oil scenario is inevitable in the short to medium term. We note that none of the nine national developments focus on public transport, walking, cycling, nor act to significantly reverse or counter long-term trends biased towards expanding road and air capacity. Even the freight measures proposed cannot be guaranteed to reduce road traffic levels or promote significant modal shift to sustainable transport modes.

Additional Forth Crossing

The promotion of a 'replacement' Forth Crossing as one of the national projects is highly misleading as it is in fact an 'additional' crossing, given there are no plans in place to decommission the current bridge. This suggests the environmental impact of the project has been greatly underestimated. A genuine replacement bridge may be a development meriting national status, but an additional crossing does not merit such a designation.

The statement of '*Need for the development*' for the '*Replacement Forth Crossing*' detailed in the annex fails to take account of the recent FETA report on cable replacement/augmentation, which could be pursued in the unlikely event that dehumidification does not correct corrosion in the current Forth Road Bridge cables. That cable replacement could be carried out at a cost of £91-122m - which is a fraction of the estimated £4200 million cost of an additional bridge. Even when costs are attributed to congestion and delays (using a methodology which errs on the side of caution – i.e. maximising the estimated cost) the repair option still appears significantly cheaper. It also seems highly improbable that such investment in repair would not be pursued in order to retain the use of the existing bridge, given the value of the asset.

Glasgow and Edinburgh Airport Expansion

As the NPF sets out a long-term strategy for Scotland it must consider a scenario of reduced air travel in a low carbon economy. The current aviation policy is incompatible with the Scottish Government's climate change targets and the National Transport Strategy goal to reduce emissions.

Planning to accommodate growth in the aviation sector along the lines proposed is unsustainable. Research completed by the Tyndall centre has shown that with: *'an annual growth rate of only half of that experienced by UK aviation in 2004, the UK's aviation sector accounts for 50% of permissible emissions in 2050 under the 550ppmv regime, and consumes the entire carbon budget under the 450ppmv level.'*¹ And scientific evidence now suggests that 400ppmv or even 350ppmv is the safe long term level. In short, uncontrolled aviation expansion along the lines supported by the NPF requires the rest of the economy to be carbon neutral – or even a net carbon sink - if the UK is to meet its climate change objectives. This is both infeasible and inequitable. The NPF takes no account of measures to reduce projected growth in air travel, for example air-rail substitution for internal flights such as those to London; or the replacement of business flights with digital communications.

Alternative priorities and proposals

In environmental and economic terms it would make greater sense for the strategy to support investment in low carbon transport projects such as

- The electrification and improvement of the major train lines between Scotland's cities so that journey times are shorter than equivalent journeys by road
- Provision for contribution to Anglo/Scottish rail upgrades to reduce travel time to the south of England
- A national programme of measures to promote active travel like cycling and walking that will lead to reduced obesity and greater public health benefits and the resultant economic gains.

With regard to the last of these, whilst individual projects are obviously not of national importance, collectively they are and would merit particular recognition and endorsement within the NPF2. As it stands these low carbon modes which are also vital to health objectives are given a cursory mention, which reinforces rather than challenges the legacy of historic policy decisions.

3. Other Observations

3.1 Energy

We are encouraged by the government's energy policy on renewable technologies, in particular heat sources and the continued commitment to no new nuclear power.

To help achieve significant carbon reductions energy reduction and efficiency must be given priority in energy policy. We would like to see all new thermal power stations required to install combined heat and power and situated in areas where the heat can be used; and any new or upgraded fossil fuel power station required to fit and operate carbon capture and storage technology. The national planning framework must have policies to promote such measures as most of Scotland's large thermal power plants will come to the end of their lives in the next twenty years

The NPF's support for decentralised energy is welcome but likely to prove insufficient in practice. We believe that a much clearer policy lead must be given to local authorities to actually facilitate projects.

3.2 Built Environment & Planning

We encourage the Government to ensure that all new developments are carbon neutral in use by 2016 at the very latest. We believe that national and major developments should be designed to the highest EU environmental standards and must be exemplars of sustainable development, in terms of their ecological footprint. We note that the private sector is ahead of the Scottish Government and local authorities in planning and developing low carbon developments, for example the Cardenden eco-town proposal.

We welcome the need for planning authorities to develop more sustainable patterns of development, which take account of climate change predictions (p 177). It is important however that the planning system should emphasise policies and strategies that mitigate against the future effects of climate change, not just plan for adaptation. The Stern report demonstrates that mitigation is more cost effective than adapting to uncontrolled climate change.

3.3 Waste Management

We welcome the Government's aspirations for a zero waste Scotland and strong emphasis on waste prevention as a strategy to achieve this (p 137). A commitment to high efficiency standards and the proximity principle is welcome and SEPA's thermal treatment guidelines should be updated to fully reflect this. A ban on non-CHP plants would provide clarity and aid site selection. The NPF should include firm guidance to local authorities to reject large-scale and inefficient incineration facilities. The NPF2 should make a commitment to an audit of the need and environmental benefits of developing large-scale specialist recycling facilities, for specific materials in Scotland.

We welcome the Government's likely recognition that radioactive waste should be managed in accordance with the proximity principle (p 235). We believe a surface storage will be the only viable option for the foreseeable future, and much more acceptable than unproven geological options being pursued in other parts of the UK or ad hoc temporary storage. Such facilities should be located and designed to meet security needs, minimise the transportation of waste, take account of environmental justice considerations and include careful community consultation. Planning such facilities should entail amendment of the NPF2 as these will undoubtedly be national developments. Dealing with a legacy of waste, whilst limiting the scale of the problem, through ruling out further nuclear stations, is a responsible and prudent policy.

3.4 Participation

We welcome the opportunity to comment and the efforts of the NPF team in their attempts to include various 'stakeholders' in the NPF consultation process. We appreciate the number of events that have been staged and their geographic range. Unfortunately we consider that the nature of engagement was inappropriate for large sections of society. We would like to see greater emphasis on implementing the National Standards of Community Engagement detailed in PAN81, and the implementation of a long term process of education and understanding to raise awareness of the NPF and its implications.

Our concern lies in the amount of resources being allocated to enable a robust and effective approach to community engagement on a long term basis, to level the playing field between the professionals who have time and resources of their own to participate in the NPF consultation and a general member of the public with something equally valid to contribute but who does so in their own time and at their own expense, with little training or experience in the world of planning. We fear those participating in the process so far are not representative of Scottish society or the communities likely to be most affected by the NPF proposals, but instead biased towards vested interests and industry and regional lobby groups. Furthermore we do not believe the format and nature of these events has provided a forum for genuine debate and consensus building between different interest groups and will be pleasantly surprised if any significant change occurs as a result of the consultation process. Any failure in this respect will set a poor example to developers and local authorities and make it harder to engage and earn the trust of communities at a local level.

4. Conclusion

This draft of the NPF contains some positive objectives in regard to the environment and in particular climate change. Sadly these objectives are not reflected in the most significant proposals, especially those related to transport. The SEA identifies the technical challenges this creates, but does not appear to have influenced the identification of national priority projects. And worse, even where the policy guidance is sound, the priority given to major climate-unfriendly transport developments undermines the credibility of that guidance for local authorities and developers. As it stands the NPF is incompatible with the high level targets set out in the Climate Change Bill and significant revision is required. The nature of the consultation process is also a significant concern because it acts as another barrier to achieving consensus on transforming Scotland into a world-leading low carbon nation and delivering the real aspirations of its people.

We trust that you are able to take these comments into account.

For further information please contact:

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ⁱ Bows, A., Anderson, K. and Upham, P. (2006) Contraction & Convergence: UK carbon emissions and the implications for UK air traffic, Tyndall Centre Technical Report 40