

National Planning Framework (NPF4) Call for Ideas

Friends of the Earth Scotland response

April 2020



Summary

NPF4 must:

- Set tackling the climate emergency, reducing air pollution and creating a circular economy as key objectives
- Prioritise infrastructure which enables a low-carbon future and exclude infrastructure which locks in high-carbon ways of doing things
- Include a ban on any new fossil fuel developments
- Enshrine the Scottish Government's position of no support for onshore unconventional oil and gas (fracking)
- Include a moratorium on building new incinerators in Scotland

About Friends of the Earth Scotland

Friends of the Earth Scotland exists to campaign, with partners here and across the globe, for a just transition to a sustainable society. We work in Scotland for socially just solutions to environmental problems and to create a green economy; we campaign to end the degradation of our environment and to create a society which cherishes and protects the natural world on which we depend; we think globally and act locally, enabling people to take individual and collective action. We are part of Friends of the Earth International - the world's largest grassroots environmental network, uniting 73 national member groups, over 2 million members and 5,000 local activist groups around the world. We are an independent Scottish charity with a network of thousands of supporters, and 10 active local groups across Scotland. Friends of the Earth Scotland's vision is of a world where everyone can enjoy a healthy environment without exceeding their fair share of the planet's resources, now and in the future.

Introduction

The National Planning Framework (NPF4) will be outlining and setting national and regional priorities, policies and developments that look towards 2050. What we do in the next ten years is going to be crucial to our response to the climate crisis and with the NPF4 covering such a large time scale it is paramount that the Scottish Government centres the climate crisis within NPF4 and factors in the climate impacts of developments in Scotland, ensuring the planning framework aids in meeting and strengthening climate targets.

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Questions

1. What development will we need to address climate change?

The climate crisis is already underway, and with NPF4 looking out to 2050 it will span the period of time during which Scotland must rapidly reduce emissions in order to reach 75% cut in greenhouse gas emissions by 2030 and net-zero emissions by 2045. **It is therefore crucial that tackling the climate emergency is a core objective of NPF4.** The IPCC has identified the next decade as the crucial period for tackling the climate crisis if we are to succeed in limiting global temperature rise to 1.5C. Decisions made and developments built during the next ten years will determine whether or not Scotland will deliver a Just Transition to a zero-carbon economy, or whether we lock our society into fossil fuels and climate emissions for decades to come, missing our targets on the way.

The First Minister has declared a climate emergency and stated that Scotland “will lead the world” in tackling the climate emergency. Now, **planning policy must be significantly amended to reflect the reality of the climate crisis** and the Scottish Government’s stated commitment to tackling it. Substantial changes are required to meet our new climate targets and accelerate Scotland’s transition away from fossil fuels towards a 100% renewable, nuclear free, future.

NPF4 must include a combination of enabling positive developments that will help Scotland to urgently reduce emissions and build resilient communities, together with a ban on developments that would have negative climate impacts.

Climate impact of developments

There must be a requirement to consider the climate impact of every development in the planning system, including at local planning authority level. This should include a full assessment of climate emissions associated with the lifetime use of a development, rather than the current limited approach of measuring only the emissions generated during construction of a development. The necessary guidance and resources must be created to support decision makers at all levels in this assessment.

Enable a rapid upscaling of renewable energy developments

For the planning system to support the national objective of delivering net-zero greenhouse gas emissions by 2045, NPF4 must create an enabling framework for full deployment of a diverse renewable energy mix across Scotland, including wind, solar, tidal generation, community renewable energy projects and a range of storage solutions, including battery storage and pumped hydro.

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Not only must Scotland be aiming for 100% domestic generation (not simply consumption as per the current target) of renewable electricity by 2030 at the latest, but we will also require an upscaling in total electricity generation as the transition away from burning fossil fuels in heat and transport will place greater reliance on electrification in these sectors in the future. **NPF4 must enable a rapid scaling up of renewable electricity generation in Scotland over the next decade.**

The new framework must create a favourable planning regime for the roll out of renewable heating and heat networks at scale across Scotland. New developments must be required to install renewable heating such as heat pumps or heat networks, instead of fossil fuelled heating systems, in line with the Government's commitment to phase out fossil fuel heating in new developments given consent after 2024.

The NPF must also create conditions favourable to **community energy projects**, in order to meet the Scottish Government's target of achieving 2GW of community and locally owned energy by 2030. This must be accompanied by resources and guidance for local planning authorities.

It should also be noted that the Government has committed to reviewing Scotland's Energy Strategy in light of the new climate targets, and has indicated that the current target for 50% of Scotland's total energy consumption across electricity, heat and transport to be met by renewables, will have to be strengthened. This places an ever greater emphasis on the role of planning policy in enabling the transition to a fully renewable energy system, and will require greater alignment of NPF and Scotland's Energy Strategy.

An end to fossil fuel developments

Current Scottish Planning Policy states that "the planning system should recognise the national benefit of indigenous coal, oil and gas production in maintaining a diverse energy mix and improving energy security."¹ This statement is now outdated.

Fossil fuel use drives the climate crisis and is responsible for the vast majority of Scotland's greenhouse gas emissions. Any fossil fuel energy generation developments granted during the period of NPF4 would still be operating by 2045, the date by which Scotland must reach net-zero emissions, thereby locking us into a high carbon future and compromising our ability to meet our legally binding targets.

Any new projects which lock in significant carbon emissions will undermine transition efforts, making it more difficult to protect workers and communities through a managed

¹ Scottish Planning Policy 2014, pg 52, point 235.

<https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2014/06/scottish-planning-policy/documents/00453827-pdf/00453827-pdf/govscot%3Adocument/00453827.pdf>

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phase out of fossil fuel industries. Investment and focus must be given to green initiatives which can provide decent and sustainable jobs as well as building more resilient local economies.

For the National Planning Framework to enable Scotland to reach net-zero emissions, it must include a ban on new fossil fuel developments. This should extend to include **a ban on any new coal, oil or gas energy generation developments, including projects below 50MW for which approval is currently granted by local planning authorities.**

Clearly this must include a rejection of current proposals to build a new Liquefied Natural Gas (LNG) terminal and Combined Cycle Gas Turbine power station at Hunterston², or indeed at any other site.

This must also extend to a ban on any developments proposed to produce or transmit hydrogen derived from fossil fuel sources.

Fracking / Onshore Unconventional Oil and Gas extraction

NPF4 should include and clarify the Scottish Government's position of no support for onshore unconventional oil and gas (fracking). The Scottish Government committed to doing this in October 2017 in a Scottish Parliament debate on the 'preferred policy position' on fracking.³ The Government subsequently confirmed, on announcing its final decision of no support for fracking in October 2019, that it would implement the indefinite moratorium using policy levers, including the NPF.⁴

Additionally, the present moratorium on onshore oil and gas is limited to *unconventional* oil and gas extraction. The NPF should go further and include a presumption against *conventional* onshore oil and gas extraction as well.

NPF4 must rule out fossil Hydrogen or Carbon Capture and Storage

NPF3 established 'Carbon Capture and Storage Network and Thermal Generation' as a National Development, with the intention of linking CCS to electricity generation. However, since NPF3 was published in 2014, Scotland's last coal power station at Longannet has closed and it is widely accepted, not least by the Scottish Government, that there is no place for coal generation in Scotland's future. This project should not be included in NPF4.

² <https://www.peelports.com/media/4436/hunterston-masterplan-2019-digital.pdf>

³ <http://www.parliament.scot/parliamentarybusiness/report.aspx?r=11127&i=101486&c=2027991>

⁴ <http://www.parliament.scot/parliamentarybusiness/report.aspx?r=12293&i=111140&c=2204992>

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The viability of CCS being implemented on a large scale is doubtful and is still a largely unproven technology, despite receiving years of funding. Relying on a technology that might never be viable not only runs the risk of delaying urgent action needed today but diverts funds away from more credible solutions such as building the infrastructure needed for 100% renewable energy across heat, transport and electricity. NPF4 must focus on the latter as priority projects, not CCS.

NPF4 must also include a ban on developments proposing to manufacture fossil hydrogen - meaning hydrogen from a fossil fuel source such as North Sea gas. There is a very limited supply of genuinely 'green' hydrogen, made using renewable electricity. To manufacture hydrogen at the scale proposed by some would require using fossil gas, clearly not compatible with action to tackle the climate emergency. NPF4 must not include fossil hydrogen projects. This must be a complete ban, with no loopholes or exemptions for fossil fuel electricity generation with Carbon Capture and Storage (CCS).

Waste and Resources

As we work towards the target of net zero emissions by 2045 and local authorities across Scotland move to divert waste from landfill before the ban on biodegradable waste to landfill comes into force in 2025, we must ensure that we do not rush to build more incinerators in Scotland.

There are serious environmental concerns around the continued burning of waste in incinerators which emit carbon to the atmosphere and create toxic ash. This is damaging to the environment and endangers people who live in the surrounding communities.

Therefore, we believe the National Planning Framework 4 should include a moratorium on building new incinerators in Scotland.

Under the European Waste Framework Directive, the waste hierarchy sets out the priorities for waste management as "prevention, reuse, recycling, recovery, disposal". Any new incinerator that is built in Scotland now will lock us into years of wasting resources by burning them and environmental damage, it will also reduce the incentive for people to reduce, reuse and recycle which is critical if we are to limit our reliance on the planet's resources.

Just Transition

Delivering a Just Transition requires a long term, comprehensive approach. With the planning framework set to carry for the next crucial decade, it has the potential to seriously undermine our efforts or to enable them. Undertaking new fossil fuel developments will lock in emissions for several more years, detracting investment from the clean economy

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and making transition efforts more difficult, risking the consequences of badly managed transitions seen too often already elsewhere.

Alternatively, with a focus on enabling the rapid growth of renewable projects, the planning framework can support a managed phase out of oil and gas. To protect workers and communities most likely to be impacted, the planning framework should give attention to those areas most likely to be impacted by the transition to a fossil free economy, preparing for a phase-out of energy intensive industries by prioritising clean projects in their place. investment and focus must be given to green initiatives which can provide decent and sustainable jobs as well as building more resilient local economies.

2. How can planning best support our quality of life, health and wellbeing in the future?

Transport and air pollution

Road transport is Scotland's biggest climate polluting sector. Greenhouse gas emissions from transport made up 37% of Scotland's total territorial emissions in 2017, and total transport emissions are up on the 1990 baseline, while they've decreased in every other sector. Air pollution, which is also primarily from transport, is responsible for the early deaths of 2,500 people in Scotland each year, and is linked to heart attacks, strokes, and respiratory problems, with children and the elderly amongst the worst affected.

Despite this, seven sites in Scotland are still exceeding air quality legal limits. **The NPF must make reducing air pollution, particularly from transport, one of the principles objectives of strategic planning and future development planning decisions.**

Planning has a huge role to play in changing the way we move around and prioritising sustainable transport. We need to see an end to developments, both commercial and residential, that rely on, or assume, widespread car ownership. Developers must have a responsibility to extend the network of segregated cycling, ensuring safe cycling is a viable option.

NPF3 acknowledged the need to reduce car use, but contained no approach or measures that would help achieve this, while also advocating significant expansion of the trunk road network. This needs to stop. NPF4 must address the need to limit car use and make sustainable transport modes the easy and default choice. Trunk road expansion must cease, with the huge cost savings diverted into maintaining existing roads, and active travel infrastructure.

NPF3 also contains an apparently "transformational vision of almost complete decarbonisation of road transport by 2050". The inadequacy of this goal is made clear by

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the new Climate Change Act. A 75% reduction in greenhouse gas emissions is needed by 2030, which is also the deadline for zero emission cities as set out in the Programme for Government. This means NPF4 needs to help rapidly change our transport system. This can include measures such as:

- An end to car-dependant developments.
- Large developments, both residential and commercial, must link to and expand pedestrian and cycling infrastructure.
- Measures that prioritise public transport, such as park-and-ride facilities on the perimeter of a traffic-reduction zone. Consideration must be given to preventing private bus operators quickly abandoning park-and-ride routes if they are not immediately profitable, as has happened across Scotland. This could include franchising those routes, or supporting a publicly-owned operator which would prioritise passengers over profit.
- End mandated parking spaces. The requirement for each household in a new development to have at least one parking space, as set out within local planning frameworks, is outdated and dangerous planning policy which positions cars as the default mode.
- Electric vehicle charging points must be essential components for any parking proposals.
- Continued electrification of the rail network, and reopening or extending routes where possible.
- Set a date for the complete ban on fossil fuel vehicle traffic, beginning with 2030 in city centres.

Homes & buildings

Fuel poverty and emissions from heating homes must be tackled in tandem by Government intervention to create warmer homes, and cleaner and greener energy. There is an opportunity, using the principles of a just transition to decarbonising the housing sector in a way that enhances the lives of people living in those homes and creates permanent jobs for well-trained construction workers, drawn in via an apprenticeship programme which recruits from all sections of the community and addresses imbalances in industry demographics.

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To address this, planning policy needs to:

- Guarantee that future expansion in Scotland's housing stock will only comprise homes with the highest energy efficiency standards, such as Passivhaus standard, its equivalent, or better.
- Require new homes and/or developments to include new local renewable energy generation wherever technically feasible.
- Require that every existing home achieve at least an EPC rating of C, or equivalent measure, by 2030.

Creating more efficient homes will reduce bills for residents, and address some of the significant health problems associated with cold and drafty homes. This, in turn, will have a positive impact on reducing demand in the health service, and create skilled jobs in building new homes and improving the efficiency of existing homes.

It is vital that all future homes in Scotland are built with circular economy principles integrated into the building plans including optimising material use to reduce waste, design for longevity and use materials which can be reused or recycled in the future.

Waste

We need to work to ensure that our rural and coastal communities are clean and free of waste, in particular plastic pollution which pollutes Scotland's streets, beaches, and water as well as directly harming birds and wildlife. This can be achieved by moving away from our throwaway society to a circular economy where materials are kept circulating in the economy for as long as possible therefore creating less waste.

3. What does planning need to do to enable development & investment in our economy to benefit everyone?

By 2050, Scotland should have moved from its current linear economy model to a circular economy where products are designed to last as long as possible, are easy to repair and made out of materials that can be recycled repeatedly. Essentially, in order to reduce our overconsumption of natural materials, we must move to a circular economy where we keep materials circulating around the economy for as long as possible before they become waste. This means designing our settlements to allow easy access to local repair and refurbishment facilities, as well as widespread and comprehensive recycling opportunities.

The scale and pace of change necessary to deliver on climate commitments requires a transformation of our economy. This represents a challenge but also an opportunity to radically overhaul a structure that is failing to deliver for people and the planet. To benefit

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everyone in Scotland, the planning framework should vision a Scotland where our economy is sustainable and aligned with our climate targets. It should also attempt to prioritise developments and investment that can tackle structural issues in the economy - rural disconnectedness, the growth of precarious work and wider spatial inequalities. Too often, there is a separation between those active as workers or consumers in the economy and those in control and with access to decision making spaces.

If planning is to provide for everyone in Scotland, it should encourage an extensive deepening of democratic participation at a local and national level in planning decisions

likely to affect them. The planning framework should facilitate increasing public participation, through decision making processes but also by enabling local community and regionally owned enterprise.

The planning framework must also prioritise projects that will also contribute to tackling wider spatial and structural inequalities in Scotland. Decent, sustainable work should be guaranteed while those industries that have been in relative decline for several decades should be supported given their capacity to deliver benefits to wider local economies.

5. What infrastructure do we need to plan and build to realise our long term aspirations?

As set out in the answer to Q1 above, Scotland must invest in renewable energy infrastructure and should give attention to those areas most likely to be impacted by the transition to a fossil free economy, preparing for a phase-out of energy intensive industries by prioritising clean projects in their place.

Further, as outlined in Q2, the planning framework must develop sustainable transport infrastructure that prioritises cycling networks, pedestrianised spaces, electricity powered and extension of rail services and investment into electric vehicles and charge points.

Future homes and waste management facilities Scotland - as also highlighted in Q2 - must be built with circular economy principles.

For more information, please contact:

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