

# NPF4 Policy Statement Consultation

## Response from Friends of the Earth Scotland

18/2/21



### Introduction

Friends of the Earth Scotland welcomes the opportunity to respond to this position statement on the National Planning Framework 4. We previously responded to the April 2020 Call for Ideas.<sup>1</sup> We answer the current consultation questions below.

We have also contributed to and support the response submitted by Scottish Environment LINK.

### 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 75 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.

### Overall comments

There are a number of very welcome high-level commitments in the Position Statement. We welcome the four key outcomes, especially Net-Zero Emissions and the Wellbeing Economy. Under the Net-Zero Emissions outcome we welcome the commitments to the types and location of future development contributing to reducing emissions, reducing the need to travel and decarbonising heat. We also welcome the recognition that an "urgent and radical shift in our spatial plan and policies is required."

This kind of radical shift is essential but we appear to have a long way to go. As an example of the kind of contradiction the Framework will need to address, Scotland has a new target to reduce car traffic levels to 20% below 2019 by 2030 from the Climate Change Plan update, yet at the same time in the recent Infrastructure Investment Plan government has reaffirmed the commitment to dualling the A96, likely to be completed around 2030, doubling the capacity on that route and encouraging new traffic.

Although there are welcome mentions of links to improving air quality and delivering a circular economy in the Position Statement, we would see these become more central objectives of the NPF4 – since so many of the levers for delivering in these areas are contained in our spatial

---

<sup>1</sup> <https://foe.scot/resource/national-planning-framework-4-ideas-response/>

planning system. Moving to a more circular economy is important in reducing climate emissions so this objective should be explicitly included in the net zero outcome. Improving air quality will also involve reducing climate emissions but poor air quality is also the largest environmental problem affecting people's health, so action in this area should be explicitly included in the Wellbeing Economy outcome.

(These overall paragraphs are included as an answer to question 7 and should be considered as being included in the answers to both question 1 and question 3 for the purpose of analysis).

## **1. Do you agree with our current thinking on planning for net-zero emissions?**

NPF4 will cover the most vital period in our fight against the climate emergency. Infrastructure and planning decisions made in the next few years will be operational for decades to come, covering the period up to and beyond our 2030 and 2045 emissions reductions targets. Therefore, the final NPF4 must be nothing less than a framework for ending the creation of infrastructure that contradicts our climate ambitions, and instead drives the adoption of low-carbon alternatives.

To deliver on Scotland's climate ambitions NPF4 must commit to blocking new fossil fuel infrastructure, ruling out the development of further incineration capacity and ending the expansion of Scotland's trunk road network. Instead, NPF4 should facilitate and encourage the adoption of zero-carbon alternatives, threading decarbonised heat solutions into housing planning and stopping the creation of out-of-town developments with no sustainable transport options.

The list of suggested National Developments published by the Scottish Government<sup>2</sup> is useful to see but, in many cases, contains little specific detail to help the reader judge if the potential national developments fit within the Position Statement's four policy outcomes. For instance, the overall proposals at Hunterston in North Ayrshire include as an Appendix the Clydeport Masterplan<sup>3</sup> for the area, which includes the possibility of both a new gas-fired power station and an LNG import and storage terminal, neither of which are consistent with the proposed Net-Zero outcome. Similarly, investment in infrastructure at airports is much more likely to increase carbon emissions than reduce them (at least Prestwick and Glasgow airports are included). It is not clear what road-building proposals might be included as part of regional development proposals. NPF4 must rule these developments out. On the low-carbon agenda, there are a number of welcome proposed developments relating to renewable energy, pumped electricity storage, renewable heat and the decommissioning of North Sea oil and gas infrastructure, but very few related to major investment in public transport.

### *Fossil fuels*

Fossil fuels drive the climate crisis and are responsible for the vast majority of Scotland's greenhouse gas emissions. Any fossil fuel energy generation developments granted during the period of NPF4 would be sufficiently long-lived to 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 the targets.

---

<sup>2</sup> [https://experience.arcgis.com/experience/4c105669d16b44e68b4649913d525b3e/page/page\\_6/](https://experience.arcgis.com/experience/4c105669d16b44e68b4649913d525b3e/page/page_6/)

<sup>3</sup> <https://www.peelports.com/media/4436/hunterston-masterplan-2019-digital.pdf>

It would not be coherent policy making to develop a framework that on the one hand talks about not compromising on climate change, and the other locks us into continued oil and gas extraction for decades to come. The Position Statement's commitment to "updating our policies on fossil fuel extraction to reflect our climate change objectives and wider energy policy" is welcome but, for the National Planning Framework to enable Scotland to reach net-zero emissions, it must include a ban on any new fossil fuel developments. This should extend to all new coal, oil or gas energy generation developments, including projects below 50MW for which approval is currently granted by local planning authorities and should include any infrastructure intended to export fossil fuels. Clearly this would include a rejection of the current masterplan proposals to build a new Liquefied Natural Gas (LNG) terminal and Combined Cycle Gas Turbine power station at Hunterston.

We strongly welcome the Position Statements commitment to including the policy position of not supporting any development of unconventional fossil fuel and gas in Scotland. However, this should go further and include a presumption against conventional onshore oil and gas extraction as well.

#### *Carbon capture, hydrogen from fossil fuels and Negative Emissions Technologies*

We are concerned that the Position Statement makes reference to support for technologies such as carbon capture and storage infrastructure, and hydrogen from fossil fuels, and the suggested National Development include many related projects. The Scottish Government has declared a Climate Emergency, so we need to invest in the solutions that work today, not expensive and speculative technologies which may never deliver at any scale.

With global carbon budgets increasingly constrained and evidence<sup>4</sup> showing that fossil fuel CCS cannot be relied upon to make any serious contribution to 2030 targets and correspondingly the 1.5°C Paris climate goal, NPF4 should do more to aid the growth of renewable energy, energy storage and energy efficiency and should not support CCS, hydrogen from fossil fuels and other Negative Emissions Technologies.

The history of NETs is one of over-promise and under-delivery. A Tyndall Centre Report commissioned by FoES and Global Witness, reviewing the role of CCS in the energy sector confirms that "*deployment has been far slower than predicted with sites in development in 2010 with a potential capacity of 150M a year ultimately resulting in 39Mt by 2020*".<sup>5</sup> The report also raises serious questions about the high cost and financial viability of CCS and its role in climate change plans, having found that of the 26 operational CCS plants in the world, 81% of carbon captured to date has been used to extract more oil via the process of Enhanced Oil Recovery, with even the CCS plants currently in development dominated by those for Enhanced Oil Recovery.

The European Commission now also predict a minimal to no role for CCS in the provision of hydrogen with the Tyndall Centre noting that this "reflects concerns about residual emissions from capture and fuel supply stages of the CCS hydrogen life cycle in the context of constrained carbon budgets, and that commercial applications of this technology are still forthcoming."

CCS is an expensive distraction from reducing carbon emissions with energy efficiency and renewable energy, and should be ruled out by NPF4 and not included in the final set of National

---

<sup>4</sup> <https://foe.scot/resource/report-carbon-capture-storage-energy-role/>

<sup>5</sup> <https://foe.scot/resource/report-carbon-capture-storage-energy-role/>

Developments. Without CCS there will be no hydrogen from fossil fuels so support for this kind of infrastructure should also be ruled out in NPF4.

### *Renewable energy*

Scotland made rapid progress on renewable energy through the last two decades but this progress has slowed, with the target for generating 100% of our electricity demand from renewables by 2020 missed. Meanwhile the UK Committee on Climate Change has said that climate ambitions mean that we need to quadruple the amount of renewable electricity we generate in the UK.

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 and rapid 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.

We welcome the proposals that the NPF4 will say that “the Global Climate Emergency should be a material consideration in considering applications for appropriately located renewable energy developments” and the priority attached to the “roll-out of renewable electricity and renewable and zero emissions heat technologies.” Further NPF4 should make clear that renewable energy development is a national priority, and more renewables energy projects and their related infrastructure should be included in the final set of National Developments (we welcome the proposal on “All renewable energy developments of 50MW or greater capacity” in the suggested National Developments.<sup>6</sup>)

The planning system should also be used to facilitate the involvement of communities in renewables energy schemes, including community ownership and community shares in schemes, and to encourage progress on the Just Transition agenda, including through planning conditions.

### *Heat and housing*

Heating buildings accounts for up to 55% of Scotland’s energy use, but renewable heating, such as heat pumps and solar thermal panels, provided just 6.3% of Scotland’s non-electrical heat demand in 2018. Progress in this sector, both in terms of delivery and of policy development has been slow. NPF4 must address this, marking the start point of a rapid transition away from fossil fuel heating, delivering a favourable planning regime for renewable heating and heat networks at scale across Scotland.

Equally important is ensuring that future homes in Scotland are built to the highest efficiency standards possible, making it easier for people to heat their homes. This will not just reduce emissions, but creating warmer homes delivers co-benefits in tackling fuel poverty and the associated health problems.

The Position Statement offers little in the way of concrete proposals to make warmer, renewable heated, houses in Scotland. While aims of the forthcoming Housing to 2040 route map sound encouraging, we need steps taken as soon as possible - and the final NPF4 document, and Housing to 2040, must include a lot more detail on how decarbonisation of heat and housing will be delivered. Some of the language offered in the Position Statement is too weak, such as “*encourage new buildings to connect to existing heat networks where located in a Heat Network Zone, wherever*

---

<sup>6</sup> <https://www.transformingplanning.scot/media/1963/316-sse-response-1-appendix-2.pdf>

*feasible*", rather than having an assumption that any development in a Heat Network Zone will be connected to a heat network unless being developed with their own renewable heat system.

To create low-carbon homes, NPF4 must include commitments that all new developments will be required to install renewable heating, such as heat pumps or connections to heat networks, instead of fossil-fuelled heating systems, with new housing built to the highest energy efficiency standards, such as Passivhaus standard and existing homes upgrades to at least an EPC rating of C by 2030.

NPF4 should also contribute to all future homes in Scotland being 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.

### *Transport*

While it is encouraging to see the position statement focus on our 2030 and 2045 emissions reductions targets, and the commitment to "the types and location of future development contributing to reducing emissions," it is important to note that historic progress in reducing emissions has been hampered by a continued lack of progress on in transport's total emissions since 1990 - largely because of our continued dependence on private car use.

The Position Statement's commitment to "seek to promote high quality walking, wheeling and cycling environments, public transport and shared transport options in preference to single occupancy private car use" is not strong enough. Simply "promoting" sustainable transport modes is largely ineffective if life still revolves around the private car. NPF4 needs to empower local authorities to restrict private car use, prioritising sustainable transport in decision making.

It is essential that NPF4 empowers and mandates local authorities to ensure that future developments discourage the use of private cars, promoting the sustainable travel hierarchy. This means restricting developments that are predicated on universal car use. The external costs of such developments on society as a whole - where car use is incentivised, green space is removed and local economies decimated - are enormous.

In particular, the residential developments placed far enough away from existing services so as to largely prohibit active travel, are inherently unsustainable. The Scottish Community Alliance found "the sequencing of infrastructure development has been seen to be crucial in moving away from a car culture – for example if active travel and public transport infrastructure are not in place until after people have started to live in houses, then cars will predominate."<sup>7</sup>

See our answer to question 4 for more detail on the role of NPF4 in creating places which support low-carbon lifestyles.

## **2. Do you agree with our current thinking on planning for resilient communities?**

The planning system is fundamental in shaping people's lives and their communities, therefore people and communities must be empowered to participate meaningfully in it. However, research has found that the majority of the public think they have no influence on the planning system, and that less than half of Scots thought the planning system had protected or enhanced their local

---

<sup>7</sup> <https://scottishcommunityalliance.org.uk/2020/08/11/just-20-minutes/>

natural or historic environment. The new Local Place Plans are an opportunity to turn this around, increase engagement and participation, and NPF4 should link into this new mechanism.

To deliver on its commitment to resilient communities and the development of a wellbeing economy, NPF4 must also support the implementation of a human right to a healthy environment. The human right to a healthy environment includes a range of procedural and substantial elements. Scotland is obliged to implement the procedural right to a healthy environment, which embodies the right to information, the right to participate, and the right to effective remedies, through the UK's ratification of the UNECE Aarhus Convention. Successful implementation of a human right to a healthy environment is a key tool for improving and encouraging public participation in environmental decision-making, so that local needs and wellbeing shape the outcomes of the planning system.

Our views on '20-minute neighbourhoods', which will contribute to community resilience, are detailed in response to question 4.

### **3. Do you agree with our current thinking on planning for a wellbeing economy?**

In general we are very supportive of the introduction of well-being economy thinking into the NPF4 and we support the concept as it used by the Wellbeing Economy Alliance.<sup>8</sup>

#### *Circular economy*

We welcome the plans to update policies to reflect new opportunities arising from the shift towards a circular economy, but the Policy Statement is lacking in real tangible policy proposals which will actually help transition Scotland from its current linear economy model to a circular economy.

Repair and reuse are fundamental to a circular economy and while it is encouraging to see the Policy Statement commit to facilitating the delivery of new infrastructure which reflects the waste hierarchy, "prioritising the reduction and re-use of materials", there is no indication of what this infrastructure will be or how it will be delivered. The same applies to the commitment to "minimise construction waste and promote sustainable use of the existing build environment" as while it is very welcome, it is unclear how much infrastructure capacity will be needed to achieve this and how long it will take for it to be in place. We could not find any circular economy projects at all in the list of nearly 120 suggested National Developments.<sup>9</sup>

#### *Incineration*

As we work towards the target of net zero emissions by 2045 and local authorities across Scotland move to divert waste from landfill as the delayed ban on sending biodegradable waste to landfill comes into force in 2025, we must ensure that Scotland does not rush into building more incineration infrastructure. Scotland currently has five working incinerators for household waste with a capacity of 788,000 tonnes per year. However, in the next three years, a further six incinerators are due to start operating with the capacity to burn a further 1,056,000 tonnes of waste a year.

There are serious environmental concerns around the continued burning of waste in incinerators which emit carbon to the atmosphere and create toxic ash. For every one tonne of municipal waste incinerated, around 0.7 to 1.7 tonnes of CO<sub>2</sub> is released. In 2018, nearly a million tonnes of CO<sub>2</sub> was

---

<sup>8</sup> <https://wellbeingeconomy.org/wp-content/uploads/2019/12/A-WE-Is-WEAll-Ideas-Little-Summaries-of-Big-Issues-4-Dec-2019.pdf>

<sup>9</sup> [https://experience.arcgis.com/experience/4c105669d16b44e68b4649913d525b3e/page/page\\_6/](https://experience.arcgis.com/experience/4c105669d16b44e68b4649913d525b3e/page/page_6/)

released by all types of incinerators in Scotland, with two fully operational waste incinerators in Dundee and Shetland producing over 110,000 tonnes of CO<sub>2</sub> between them.

Continuing to build incinerators in Scotland is not compatible with the Policy Statement's commitment to reflect the waste hierarchy because it locks us into years of wasting resources by burning them and reduces the incentive for people to reduce, reuse and recycle, all of which is critical if we are to limit our reliance on the planet's finite resources. Therefore, the National Planning Framework 4 must include a moratorium on building new incinerators in Scotland.

#### **4. Do you agree with our current thinking on planning for better, greener places?**

##### *20-minute neighbourhoods*

The goal of '20-minute neighbourhoods' should be welcomed by all, as this would have huge benefits for air quality, local economies and wellbeing, in addition to helping to reduce GHG emissions from transport. 20-minute neighbourhoods have previously been defined as neighbourhoods which support "a lifestyle where it is easier for everyone to choose to live, work and play more locally."<sup>10</sup>

Scottish Community Alliance conducted research into the key characteristics of 20-minute neighbourhoods, many of which relate to the availability of facilities and services locally.<sup>11</sup> Part of developing 20-minute neighbourhoods means that out-of-town retail parks and entirely residential developments situated outside of towns, both of which are completely dependent on private car use to connect people with facilities, need to be prevented by the planning process.

A move to developing proper 20-minute neighbourhoods will need clear and robust changes in NPF4, alongside leadership from the Scottish Government, to influence local strategic plans and local authority decision making. This robust framework, with a clear vision of what a 20-minute neighbourhood actually is, is crucial to avoid the phrase being co-opted and used to describe something that is less than what it should be.

Recommendations within the recently published 'A New Future for Scotland's Town Centres' should be incorporated into NPF4.<sup>12</sup> The independent group urged the Scottish Government to implement a digital tax to advantage our town centres, an out-of-town parking levy and a moratorium on out-of-town developments, all of which should be factored into the final NPF4.

##### *Lifetime impacts*

References to considering the location of developments, and the impact on emissions across the lifetime of a development, are encouraging. This should also consider the climate and material impact of the materials used. It is important this Circular Economy approach is embedded across all planning decisions, including at local planning authority level - replacing the historic focus which has been on emissions associated with just the process of construction.

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

---

<sup>10</sup> [https://www.improvementservice.org.uk/data/assets/pdf\\_file/0016/23173/EMBriefing-20MinuteNeighbourhoods.pdf](https://www.improvementservice.org.uk/data/assets/pdf_file/0016/23173/EMBriefing-20MinuteNeighbourhoods.pdf) p.3

<sup>11</sup> <https://scottishcommunityalliance.org.uk/2020/08/11/just-20-minutes/>

<sup>12</sup> <https://www.gov.scot/publications/new-future-scotlands-town-centres/>

during construction. The necessary guidance and resources must be created to support decision makers at all levels in this assessment.

## **7. Do you have any other comments on the content of the Position Statement?**

There are a number of very welcome high-level commitments in the Position Statement. We welcome the four key outcomes, especially Net-Zero Emissions and the Wellbeing Economy. Under the Net-Zero Emissions outcome we welcome the commitments to the types and location of future development contributing to reducing emissions, reducing the need to travel and decarbonising heat. We also welcome the recognition that an “urgent and radical shift in our spatial plan and policies is required.”

This kind of radical shift is essential but we appear to have a long way to go. As an example of the kind of contradiction the Framework will need to address, Scotland has a new target to reduce car traffic levels to 20% below 2019 by 2030 from the Climate Change Plan update, yet at the same time in the recent Infrastructure Investment Plan government has reaffirmed the commitment to dualling the A96, likely to be completed around 2030, doubling the capacity on that route and encouraging new traffic.

Although there are welcome mentions of links to improving air quality and delivering a circular economy in the Position Statement, we would see these become more central objectives of the NPF4 – since so many of the levers for delivering in these areas are contained in our spatial planning system. Moving to a more circular economy is important in reducing climate emissions so this objective should be explicitly included in the net zero outcome. Improving air quality will also involve reducing climate emissions but poor air quality is also the largest environmental problem affecting people’s health, so action in this area should be explicitly included in the Wellbeing Economy outcome.

**For further information please contact Friends of the Earth Scotland on [info@foe.scot](mailto:info@foe.scot)**