| **Summary** The National Planning Framework 4 is absolutely crucial in our efforts to tackle the climate crisis, with its spatial vision and policies influencing planning out to 2050. It is vital therefore that NPF4 sets out a clear framework for decarbonisation and prevents development that would further harm the climate or undermine targets. The NPF4 must:* Ban new oil and gas developments
* Introduce a presumption against Negative Emissions Technologies
* Constrain the use of Scottish land for ineffective carbon ‘offsetting’
* Enable the development of a circular economy
* Support the roll out of well planned active travel measures
* Strengthen and reinforce Scotland’s fracking ban
* Maintain the moratorium on new nuclear power
* Introduce an Equal Right of Appeal to make planning fairer and more democratic
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**Overview**

The National Planning Framework 4 is crucial in our fight to tackle the climate emergency and build the better world that we know is still possible. Encompassing both planning policy and the strategic spatial vision for Scotland for the next decade, NPF4 has the potential to lock-in dirty fossil fuel developments and business-as-usual or it could pave the way forward for a clean energy powered, re-localised economy, and healthy, thriving communities living in balance with nature.

While we strongly welcome the identification of "addressing climate change and nature recovery" as the "primary guiding principles for all our plans and planning decisions", many of the policies and elements of the spatial vision fall short of providing a robust and realistic framework for doing so.

**Oil and Gas**

We welcome the inclusion of Policy 22 (b) restricting fossil fuel exploration, development and production, but consider this should go further and rule out such developments in all circumstances given that there is currently enough fossil fuel extraction already under development globally to cause truly catastrophic warming, and here in the UK to go far beyond our fair share of emissions.

Climate science is clear that to keep within the critical 1.5°C threshold there is no atmospheric space for new fossil fuels and production must begin to decline now and continue to be phased out over the coming decade. Any new exploration, development and production of fossil fuels would be inconsistent with Scotland’s national greenhouse gas reduction targets and international obligations to do our fair share of emissions reductions in line with the Paris Agreement.

**CCUS & Hydrogen**

We are deeply concerned about the presumption in favour of proposals for negative emissions technologies in the NPF4. Any fossil fuel infrastructure which includes Carbon Capture and Storage (CCUS) now developed will be operational long after we should have completed our energy transition. This would lock Scotland into high carbon emissions for decades to come, compromising our ability to meet our climate targets.

On CCUS coupled with fossil or 'blue' hydrogen it is clear this can only be a transitional strategy because the process is not zero carbon. It therefore makes little sense to go to the expense and disruption of creating a fossil hydrogen and CCUS system which cannot reach significant scale for more than a decade and will need to be phased out again only a decade or so after when we reach the 2045 target.

Page 115 of the NPF4 states that CCUS/Hydrogen will “establish opportunities to decarbonise industry, transport and heat.” - Hydrogen cannot be relied upon to decarbonise heat. It is inefficient and costly and often relies on Grey or Blue Hydrogen.[[1]](#footnote-0)

Instead of supporting an incredibly uncertain technology like CCUS in principle, NPF4 policy support should be directed towards enabling the just transition through creating new decent greenjobs in proven and readily available technologies like renewables, oil and gas decommissioning and decarbonisation across sectors.

**Offsetting**

While the prioritisation of peatland restoration and woodland creation and restoration are welcome, we are concerned about the focus on carbon offsetting as part of this, expressed particularly in the spatial designations for parts of the Highlands and Southern Scotland.

Offsetting schemes, where companies or countries pay others to reduce their emissions or absorb carbon dioxide instead of cutting their own emissions, often through trading in a regional or international carbon market, are riddled with loopholes and plagued with double counting and corruption. After almost 20 years of operation, there is no evidence that either the EU’s emissions trading scheme nor the UN’s carbon offsetting scheme have had any success in reducing emissions.

The Scottish Government has rightly committed to not using overseas credits to meet domestic emissions targets. Neither should it go down the path of providing false hope and dangerous distractions by opening up large swathes of Scotland's landscape for corporations and other countries to pay to disguise their inaction on the climate crisis.

**Transport**

While the approach of 'distinctive' and 'liveable' places is welcome, NPF4 currently lacks policies to realise these aspirations. To make our places more liveable, distinctive, safe, pleasant, easy to move around, welcoming, nature-positive and resource efficient, NPF4 must ensure that people can travel in a safe, affordable and welcoming way.

The Scottish Government therefore must take steps to prevent the closure of locally-delivered lifeline services such as banking, public transport and healthcare as public and private operators alike attempt to cut costs. NPF4 needs to be much more robust in preventing unsustainable out-of-town developments and include concrete measures to increase the roll out of active travel and public transport infrastructure, while minimising the need for car use. Car-dependent residential developments must be prohibited. Councils should be encouraged to transform parking spaces into green space and other more useful forms of public space.

**Circular Economy**

While we welcome the focus on circular economy in NPF4, the infrastructure needs of a circular economy do not only relate to waste and should be fully integrated into the broader planning framework. The current considerations of sustainable material practice are worryingly vague and, for the most part, confined to specially dedicated sections within NPF4. As well as assessing the material suitability of future development proposals and offering guidance at a local level, the NPF4 should detail the strategic requirements, at a national level, for sustainable material use in a circular economy to guide planners at a local and national level.

More direction is required particularly for material intensive sectors such as construction, energy and manufacturing. There should be recognition that some materials which are currently hard to recycle, such as concrete and cross-laminated timber, need a clearer policy focus in order to address their difficulty in recycling and ensure a truly circular economy..

**Nuclear**

We are concerned about the scope for development of nuclear fuels at Policy 11 (a\) through support in principle for 'all forms of…low-carbon fuels'. Nuclear energy is an inefficient, dangerous and expensive method of producing energy and the Scottish Government should remove this loophole and ensure that the moratorium on new nuclear power is upheld through NPF4.

**Human Rights & Equity**

We agree strongly with the statement on page 13 that *"Planning should respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality."*, however there is insufficient detail to show how this will be applied in practice. It is essential that the human rights of those extracting materials for Scottish developments and managing Scottish waste outside of Scotland, and suffering from the impacts of climate change driven by historical and current Scottish emissions should be considered in the application of this policy alongside the human rights of people living and working in Scotland.

We also agree with the points outlined on page 13 that call for a *“fair and inclusive planning system*”. However the policies that follow are inadequate to fulfil this ambition.

A particular obstacle to realising a truly fair and democratic planning system is the one-sided nature of the existing right of appeal. It is plainly unfair that communities and other affected parties have no right of appeal against a decision to grant planning permission, while applicants are able to appeal against a decision to refuse it. This inequality undermines trust in the planning system, reduces the influence local communities have on the future of their area, and produces weaker planning decisions.

We urge the Scottish Government and Parliament to introduce an equal right of appeal through NPF4 to make planning fairer and more democratic, improve trust in the system and encourage community participation in the creation of Local Development Plans. The credible threat of community appeals would incentivise more meaningful engagement and better decisions by planning authorities, applicants, key agencies and communities.

**Conclusion**

To deliver on its laudable ambition to address the twin crises of climate and nature breakdown NPF4 must be strengthened both in its spatial vision and the policies it introduces including through:

* Banning new oil and gas developments
* Introducing a presumption against Negative Emissions Technologies
* Constraining the use of Scottish land for ineffective carbon offsetting
* Enabling the development of a circular economy
* Supporting the roll out of well planned active travel measures
* Strengthening and reinforcing Scotland’s fracking ban
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1. https://www.euractiv.com/section/energy/news/avoid-hydrogen-for-heating-homes-urges-energy-efficiency-coalition/ [↑](#footnote-ref-0)