

Tom Arthur MSP, Minister for Public Finance, Planning and Community Wealth
Scottish Government
St Andrew's House, Regent Road
Edinburgh
EH1 3DG

Climate Change Committee
1 Victoria Street,
Westminster, London,
SW1H 0ET
w theccc.org.uk

Date 30th March 2022
Ref Sent via email.

Dear Minister,

We are writing as requested to give comments on the draft fourth National Planning Framework (NPF4).

The broad vision of NPF4 is generally compatible with advice from the Climate Change Committee. The plan also shows welcome progress on recommendations that we have made over the past two years.

Infrastructure decisions made today will substantially determine the achievement of the statutory climate goals in years to come. We welcome, therefore, the alignment between NPF4 and the Infrastructure Investment Plan. The provision of new infrastructure is central to reducing Scottish emissions quickly and preparing Scotland for the changing climate. Locking in positive climate outcomes must be at the core of planning considerations.

Implementation now appears to be the single greatest challenge. NPF4 focuses more on the vision for Scotland than on the types of planning applications that should or should not be supported. Much will rest on local implementation, so local policies and development plans must be well-aligned with the new Framework. It is unclear how the Scottish Government will ensure compliance with NPF4.

We have provided specific comments on NPF4 by considering the sectoral implications:

- **Buildings.** For buildings we have comments on the following policies:
 - *Policy 9: Quality homes.* We welcome the ambition to support the delivery of high-quality homes, which are energy efficient and net zero emissions. We also welcome the suggestion that development proposals for homes reflect the six qualities of successful places, which directly consider climate adaptation and mitigation. While we welcome the policy proposal, at this stage it is just a set of high-level intentions, with no detail provided on how these outcomes will be achieved. Proposals could also more explicitly aim to minimise embodied carbon – while this could fall under 'sustainable environmental footprint', the choice of wording as to what this represents is quite vague.

- *Policy 11: Heat and cooling.* We welcome the integration of heat networks into planning policy, including the expectation that local development plans consider the area's Local Heat and Energy Efficiency Strategy (LHEES) and heat network zones for new buildings, existing building retrofit and energy infrastructure. It would be helpful to clarify if this is an expectation or a requirement. The proposal that developments that will generate waste or surplus heat are accompanied by a plan to use the heat generated makes sense. The framework misses the opportunity to include proposals to convert existing heat networks to low-carbon sources or to expand existing heat networks.
- *Policy 27: Town Centre Living.* Consideration of climate adaptation and mitigation should be explicit in these developments, following the six principles of quality design. As with previous policies, this is more of a general intention rather than a plan for achieving these changes through the planning system.
- **Electricity generation.** For electricity generation we have comments on the following policy:
 - *Policy 19: Green energy.* We welcome the direction that authorities should seek to ensure maximisation of renewable energy production and support in principle for production, storage and supporting infrastructure. We also welcome the requirement for a decarbonisation strategy to show how emissions sources are abated, but this should not just apply to major applications for energy generation from low carbon sources, it is important that it applies to all major applications for energy generation whether low-carbon or not. We would also like climate resilience to be mentioned in this context.
- **Land use, land use change and forestry (LULUCF).** For LULUCF we have comments on the following policies:
 - *Policy 30: Vacant and Derelict land.* While the high-level policy talks about using vacant or derelict land to contribute to climate targets and support biodiversity and resilience, which we welcome, this is not mentioned in the listed policy proposals.
 - *Policy 32: Natural places.* We welcome the recognition of the role of the planning system in protecting, restoring and enhancing natural places, as well as the acknowledgement of nature-based solutions. We would like to see further detail on the 'best use' of nature-based solutions, including how these will be planned and targeted, and work alongside other land priorities, avoiding unintended outcomes. Development proposals should also consider the risk to carbon stocks held in the soils and vegetation of natural habitats and look to protect and enhance these.
 - *Policy 33: Peat and carbon rich soils.* We welcome the controls to restrict development on peatland, carbon rich soils and priority peatland habitat is welcome, but detail is required to set out what would be considered 'essential' in this context. Alongside

consideration of disturbance, degradation or erosion of the peat soils, consideration should also be given to the impact on the hydrological footprint of the peat body, which may extend beyond the peat boundary. Stronger terms are required regarding the restriction of peat extraction, with this practice stopped outright and steps taken to restore all extraction sites by 2035 (in line with previous CCC advice).

– *Policy 34: Trees, woodland and forestry.* This policy should demonstrate greater ambition and set out more detail how the planning system can proactively enhance and expand woodland cover. Policy 34 c addresses woodland removal and compensatory planting at only a high level. Further detail should set out how compensatory planting will take into account the age, condition and habitat provided by the original woodland, including the carbon stocks held in vegetation and soils. If woodland removal is deemed unavoidable, compensatory planting should deliver greater enhanced public benefits than the original woodland.

– *Coasts – Policy 35.* Alongside the adaptation and resilience aspects of coastal management, consideration should be given to the significant carbon stores held in coastal habitats, and clear steps taken to identify and protect these from disturbance and loss by development.

- **Manufacturing and construction (M&C).** For M&C we have comments on the following policies:

– *Policy 20: Zero Waste.* There is good content on resource efficiency and embodied emissions. We would prefer the Framework to give more detail on this if possible.

– *Policy 27: Town Centre Living.* We support converting existing buildings to homes, as this is likely to lead to lower carbon emissions (when embodied emissions are included) than a new development.

– *Policy 30: Vacant and Derelict land.* As above, we welcome the principle of supporting the reuse of existing buildings and regarding demolition as the least preferred option. This should have overall benefits in terms of emissions including embodied carbon.

- **Transport.** For transport we have the following comments:

– We welcome the ambition on reducing the need to travel unsustainably, designing in local access to services, and increasing the availability of more sustainable modes of transport. We also welcome the identification of not just the emissions benefits of these steps, but also the wider health, economic, and social co-benefits. Appraisal mechanisms will need to ensure that these co-benefits can be captured in analysis performed to guide decision-makers.

– We welcome the very strong description of what is meant by a 20-minute neighbourhood. We also welcome the emphasis of the importance of following the principle of these neighbourhoods,

rather than a hard requirement that it be possible to travel across them within 20 minutes, especially given Scotland's diverse geography. However, the practical applicability of this guidance could be strengthened, for instance by setting out more clearly these underlying principles that planners should comply with. Some examples could help illustrate how these can be applied more widely than just in urban environments.

- We welcome the requirement in Policy 7 that local development plans should set out proposals to support the development and network of 20-minute neighbourhoods, but it might be useful to make clearer what these proposals should include. This should clarify that the principles underpinning the 20-minute neighbourhood should be embedded into all planning decisions, not just those where an entire new neighbourhood is being created. For instance, providing cycle access to a new development, or ensuring properties are within walking distance of a grocery shop, can achieve some of the connectivity goals even if they are not a full “20-minute neighbourhood”.
- We welcome the statement in Policy 10 that plans that generate significant travel will not be supported if they increase reliance on the private car. However, it feels like there is a missed opportunity here to emphasise the importance of working towards the Scottish Government's target of reducing car mileage by 20%. This requires not only avoiding increasing reliance on the private car, but actively reducing it. This aim, and the priority on compliance with it, should be explicitly mentioned within this policy. To this end as well, the Framework should mention schemes to actively reduce car usage, such as low-traffic schemes, occupancy requirements and parking restrictions.
- The usefulness of Policy 10 in practice will depend on whether it is supported by separate guidance to Local Authorities on things such as (i) how many EV chargers are likely to be needed, and when; and (ii) how to appraise and quantify the co-benefits offered by sustainable transport (e.g. congestion, air quality, and health impacts, plus emissions reductions), beyond the classical metrics such as travel time and economic connectivity (which often favour car travel).
- There are a few other policies (notably Policies 9 and 27) which are also relevant to transport as they aim to ensure that residences are suitably located relative to amenities as to avoid locking in dependence on high-carbon modes of travel. We welcome this wider cut-across, as it demonstrates that the Framework has recognised the interdependencies between sectors in delivering a net zero society, although in places there could be more clarity on what exactly planning authorities should do. At present, some of it is more like a general vision than a blueprint for what decisions planners should make.
- We welcome the suggestion in Policy 9 that development proposals for homes encourage active lifestyles and reduce car dependency.

- **Waste.** The ambition and tone of the proposals on waste are good and they cover the right issues, providing a signal that considerations such as the waste hierarchy and circularity should be factored into development plans. We would like to see more detail as to how these principles will be applied in practice, for instance how developments will be required to demonstrate consistency with the waste hierarchy and how circular economy principles will be considered as part of design and construction. We welcome the review into the role of energy from waste and we will be interested to see how the outcomes of this will work alongside the planning responsibilities of local government.

We also have specific comments topics related to adaptation:

- **Flooding.** We welcome the inclusion of policy on surface water flooding, but we would like clarity on whether the policy applies to all developments. We would also like clarity on the requirements or criteria for essential infrastructure to be allowed to be built in the future flood plain. We would further like clarity on whether the Framework's monitoring and evaluation framework will include collection of data on development in flood risk areas.
- **Coastal change.** We welcome the proposition that developments should be supported in coastal areas only where it does not result in further coastal protection measures being needed, taking into account future sea level change.
- **Infrastructure.** We would like an explicit reference to the location of new infrastructure when stating that they should be designed to be adaptable to the future impacts of climate change.
- **Overheating in buildings.** We welcome the requirement for development proposals to reduce overheating, prioritising natural or passive solutions.
- **Peat and carbon rich soils.** We welcome the discussion of peatlands and soil health as part of nature-based solutions. However, we would like more direct consideration of climate adaptation for and climate risks to peatlands and soils.

Finally, we have the following comments related to governance:

- We welcome the attempt to embed concepts such as sustainability into the Framework. The planning system is the main lever that local authorities have at their disposal to shape major changes to their communities, so it is vital that the Framework makes clear the importance of making decisions now that lock in climate-positive behaviours among communities in the future. We welcome the introduction of concrete policies requiring the consideration of mitigation and adaptation impacts in making planning decisions.
- However, the key challenge lies in how effectively these ambitions can be translated into practice at a local level. Previous frameworks have fallen short in this regard, despite recognising the importance of climate goals, due to lack of clarity for how practitioners should address this. In particular, it is often difficult to balance priorities between multiple core

objectives, which could again pose a risk here given the four distinct places goal. The Framework attempts to identify core themes that run across and bring benefit simultaneously to all four of these boxes, but whether this works will depend crucially on how effectively it is translated into guidance and training provided to local practitioners.

- Without clear rules setting out what sort of applications should be approved and which should not (recognising that this also brings valuable flexibility), a lot of onus is placed on local planning decision-makers. Scottish Government must – if this vision is to be realised – ensure that (i) local resources and plans are updated to align to it; (ii) best-practice and risks/issued are able to be shared between local authorities; and (iii) adequate support (guidance, training and resource to build capacity and expertise) is provided to allow robust implementation.



Chris Stark
Chief Executive of the Climate Change Committee