

Quakers in Scotland response to the Draft Fourth National Planning Framework (NPF4)



Quakers in Scotland: the Religious Society of Friends (Quakers) is a faith group committed to promoting peace, equality, truth, simplicity and sustainability within Scotland's society. We are responding to the Scottish Government's consultation on the Draft Fourth National Planning Framework (NPF4) from our convictions as Quakers. *"We do not own the world and its riches are not ours to dispose of at will. Show a loving consideration for all creatures, and seek to maintain the beauty and variety of the world. Work to ensure that our increasing power over nature is used responsibly, with reverence for life"* (Advices and Queries 42).

The NPF4 naturally impinges upon many aspects of society. As Quakers, we have focussed our response on the climate and ecology crises, economic justice and land reform.

Overview

We welcome the tone and direction set by NPF4, particularly the way it builds on much of the current discourse on the climate and ecology crises, and the desperate need for transition to a carbon-zero society. To reach "net-zero" will demand significant changes to our daily lives (how we travel, where we live, how much power we need to sustain our lives). NPF4 acknowledges the formidable tasks ahead and we welcome the opportunity to contribute to this consultation.

Our concerns are described below, and can be summarised as follows:

- 1) Planning policy should have an overarching priority to contribute both to achieving Scotland's carbon emission reductions targets set for 2030, 2040 and 2045 when "net-zero" is to be reached, and to the halting and reversal of the degradation of Scotland's biodiversity.
- 2) There is a great risk that the steps needed to abate the climate and ecology crises will exacerbate a growing division between rich and poor. These steps must be made accessible and affordable for all in our society, not just for those who are fortunate to have the money to invest in the necessary changes for themselves.
- 3) Controls need to be strengthened to ensure that the priority to meet carbon emission reductions as soon as possible is not overridden by immediate benefits from projects which, in other respects, are in conflict with the "net-zero" priority. Opportunities to make such compromises must be minimised.
- 4) Carbon offsetting schemes should not be permitted as compensation for a carbon-emitting project; at the very least, the purported beneficial impact of such schemes should be treated with scepticism and, therefore, heavily discounted in any assessment of a project.
- 5) NPF4 should include discussion of how planning policy might support a net-zero society producing sufficient for its needs within the limits of its sustainable resources.

- 6) NPF4 should broaden the section on how planning policy supports realisation of human rights in Scotland. This is a much wider question than just ensuring adequate consultation of communities.
- 7) Transparency: NPF4 impacts on a huge range of ongoing, detailed policy development. A brief explanation of where the aspirations of NPF4 are being supported by detailed work would place the document in the context of Government strategy, particularly its “net-zero” strategy.
- 8) Pace and delivery: there is no explanation of how the policies of NPF4 will be delivered by Local Authorities, or by when. This is a major weakness in NPF4; inclusion of how the policies are to be implemented and under what timetable would enhance its credibility for the lay reader uninitiated in the detail of planning regulation and law.
- 9) In the field of Industrial Green Transition Zones (IGTZs), and more widely, NPF4 would benefit from the inclusion of a strong statement to the effect that tools such as blue hydrogen combined with Carbon Capture and Storage (CCS) are “transitional”; CCS may be required post 2045 but the over-riding principle of NPF4 must be to support the elimination of ongoing carbon emissions from the way we live.

Detailed Comments

Policy 2: Climate emergency Q24: Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency? We recognise that we are in the midst of a climate and ecological emergency and that, if Scotland is to play its part in averting this crisis, NPF4 must ambitiously and unashamedly ensure that Scotland’s built environment reduces emissions and restores biodiversity. We note the statement in part 3, on national planning policy, that *“climate change and nature recovery are the primary guiding principles for all our plans and all our decisions”* However, NPF4 makes room for exceptions. Paragraph 2c states that developments which would generate significant emissions *“should not be supported unless the applicant provides evidence that this level of emissions is the minimum that can be achieved for the development to be viable and it is also demonstrated that the proposed development is in the long-term public interest”*. Moreover, for national and major developments, *“where significant emissions are likely (even as minimised) in relation to national decarbonisation pathways but the planning authority is minded to grant consent, emissions off-setting measures may be considered”*.

Our concern is that it might prove all too easy to circumvent the primary guiding principle for development to contribute to achieving Scotland’s carbon emission reduction targets. How will Government scrutinise decisions of local planning authorities for this risk? What will be the definition of “long-term public interest? How big does the benefit have to be to override the carbon emission priority? To get to net-zero will require significant change within society. Change tends to be resisted. How will Local Authorities be supported to make what might be considered unpopular decisions which put cutting emissions ahead of, for example, creation of new local employment prospects?

A connected concern is the suggestion that offsetting measures can be taken into account as a way of pushing for approval of a major project which will generate significant emissions. In

the context of finite (and reducing) living systems available to absorb CO₂, and the massive volume of emissions already released from fossil fuels resulting from carbon stored over millions of years, carbon offsetting seems insignificant in proportion. There is a great danger that such measures become a diversion carrying a false “feel good” impression. Their impact is difficult to verify and cannot be guaranteed. Any offsets typically happen over a long, or deferred, timescale and so do not match the immediacy of emissions created by the project in question. Moreover, there is growing evidence that offsetting schemes often fund projects which would have been taken forward anyway. In short, they turn out not to be additional measures to compensate for the emissions of a particular project. This is a very difficult area, fraught with risk of manipulation. We would prefer offsetting measures not to be taken into account, or that they be severely discounted. Will tough hurdles be put in place to ensure that any offsetting is robust, real, and truly incremental?

The approach and spatial principles set out in the strategy

We welcome an approach that focusses on delivering sustainable, liveable, productive and distinctive places. Equally the spatial principles compliment these approaches well and we particularly welcome the principles of conserving and recycling assets and of a just transition, as well as the precautionary principle laid out later within the document.

We note the statement in part 3, on national planning policy, that “*climate change and nature recovery are the primary guiding principles for all our plans and all our decisions*” but are concerned that this is not included as a specific spatial principle. There is a general recognition that economic development since the industrial revolution has been a net contributor to biodiversity decline. **Therefore, as stated above, climate change and nature recovery should be the overarching principles guiding the rest of NPF4.**

Sufficiency: related to this point, we think that greater consideration could be given to the concept of sufficiency as a spatial principle: how do we use and develop simply what we need to thrive while enabling the natural world, of which we are a part, to do so too? Some aspects of the document, such as the principle of compact growth, reducing the need to travel etc, do allude to this, but other areas such as energy production focus on maximising production. While we recognise that there are good reasons for maximising renewable energy production, discussion of what sufficient energy production might look like is an important omission. The current climate and ecological emergencies are the result of human overconsumption of the earth’s resources. **Without any consideration of the principle of sufficiency there is a risk that we will repeat the same mistakes merely in a different form.**

Policy 4: Human rights and equality Q26: Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality? This section seems underdeveloped. Human rights in planning and development is not just a matter of ensuring that people are consulted; it is also about reflecting on how Scotland’s land and built environment enables the rights of all to be realised. For example, how will those least able, or simply unable, to afford the renewable heating systems and insulation be given access to these essential requirements (essential for wellbeing and for “net-zero”)? How will access to enhanced public transport be guaranteed for the marginalised, disabled and those with minimal financial resources? How will they be enabled to have their homes improved through greater insulation and renewable heating?

Although not appropriate to include great detail on these matters, NPF4 would be enhanced by taking a wider view of how planning policy has an impact on human rights. We would encourage the Scottish government to explore this area more thoroughly before producing the final draft.

Transparency for us all

It is hard for the uninitiated to understand how the policies and aspirations in NPF4 will feed through to local planning policy of Local Authorities across Scotland. The document would be greatly enhanced by a simple guide explaining how NPF4 will be fulfilled at the local level, presumably through the Town and Country Planning (Scotland) Act 1997.

Moreover, a clear guide of where Scottish Government policy will support NPF4 policies would give the document more strength. For example, the section on Quality Homes would be enhanced by reference to the direction of policy on building regulations and plans for decarbonising heating systems: this could include reform to the EPC certificates system, incentives for switching to renewable heating, timetables for retrofitting homes with improved insulation, different forms of housing development (e.g. co-housing). We note the Local Government, Housing and Planning Committee's concerns (letter to the Convenor to the Cabinet Secretary for Net Zero, Energy and Transport in December 2021) about how local planning factors might obstruct the retrofitting work which is required. How are such conflicts to be resolved? A broader example relates to land use in Scotland. Having previously responded to the consultation on the Third Land Use Strategy, we are unclear what the relationship between the Land Use Strategy and the National Planning Framework. Much of Scotland's land use, such as agriculture and forestry, fall out with planning and development and yet have a direct bearing on the climate and ecological emergencies. We would therefore like to see greater clarity on how these two strategies will work together in Scotland's long term interests.

Thus, there is a complex network of inter-connected policy development closely related to NPF4. Getting this across to the reader would greatly enhance the document.

Pace and Delivery

The Climate and Ecology Crises are emergencies. Achieving the 2030 target reduction (i.e. to have cut emissions by 75% against 1990 levels) is vital. It is not just about getting to net-zero by 2045. NPF4 which sets the tone for much of the change which is required makes no mention of any timetable. How quickly will Local Authorities be required to take note of NPF4? How quickly will they have to adjust local planning policy to implement NPF4?

NPF4 makes no statement about how the policies will be implemented. The policies are worded in terms of "should" rather than "must". Does the Town and Country Planning (Scotland) Act 1997 require Local Authorities to implement NPF4? If there is no requirement to implement NPF4 policies, there is a risk that the policies will become unfulfilled aspirations.

NPF4 would be a much stronger document if it included sections on how the policies are to be delivered at a local level and within what timescale.

Spatial strategy areas

We welcome the statement that the *“strategy is to transform the way we use our land and buildings so that every decision we make contributes to making Scotland a more sustainable place.”* Many of the challenges and opportunities that are outlined in the document, and which characterise each region, seem at face value, pertinent. A brief description of how these regional characteristics were arrived at would be helpful. For example, was there any prior community consultation or consultation with Local Authorities?

National Developments

Many of the national developments are encouraging, particularly the National, Walking, Cycling and Wheeling network and the circular economy management facilities. We support the intention to shift major national developments from a “do no harm approach” to one which *“restores biodiversity and improves natural habitats”*. However, if such an approach is to be successful the framework will need to make clearer how this will be evaluated. Similarly, the term “industry of national importance” needs further definition with clarity given about how decisions are to be made when ecological and economic considerations are in tension and where both can be argued to be in the long term interest.

Industrial Green Transition Zones (IGTZs).

Friends of the Earth Scotland, and others, have expressed significant concerns about the role of Carbon Capture and Storage (CCS), and hydrogen within Scotland’s transition to a low carbon economy. There is a risk that, either through the power of vested interests or general societal resistance to change, CCS will be grow to be seen as the solution to cutting carbon emissions and that hydrogen created using fossil fuel energy (so-called Blue Hydrogen) will become regarded as “clean” renewable energy. We must focus on ceasing to emit carbon into the atmosphere as the main strategy to reach “net-zero”. While we note the statement that *“if any IGTZ is found to be incompatible with Scotland’s transition to net zero, Scottish Government policy will change accordingly”*, it is unclear what the review mechanism is to reach such a finding, and we are also concerned that by the time such a conclusion was reached much carbon, time and energy will have been spent. We would therefore like to see a more precautionary approach where these technologies were thoroughly scrutinised prior to being given approval.

NPF4 would benefit from the inclusion of a strong statement to the effect that tools such as blue hydrogen and CCS are “transitional”; CCS may be required post 2045 but the overriding principle of NPF4 must be to support the elimination of ongoing carbon emissions from the way we live.