**National Planning Framework 4**

**Review of changes to the Framework (January 2023)**

**How does the new framework look, after the Consultation in spring 2022?**

**Can we see evidence that our input, along with others’, had some influence?**

**What we said:** 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.

**What the plan now says:**

* “The global climate emergency and the nature crisis have formed the foundations for the spatial strategy as a whole. The regional priorities share opportunities and challenges for reducing emissions and adapting to the long-term impacts of climate change, in a way which protects and enhances our natural environment” (P8)
* “Policy 33 is clear that fossil fuel exploration, development and production (excluding unconventional oil and gas) will not be supported other than in exceptional circumstances, and that the Scottish Government does not support the development of unconventional oil and gas in Scotland.” (p8)
* “Policy 3 plays a critical role in ensuring that development will secure positive effects for biodiversity. It rebalances the planning system in favour of conserving, restoring and enhancing biodiversity and promotes investment in nature-based solutions, benefiting people and nature. The policy ensures that [Local Development Plans] LDPs protect, conserve, restore and enhance biodiversity and promote nature recovery and nature restoration. Proposals will be required to contribute to the enhancement of biodiversity, including by restoring degraded habitats and building and strengthening nature networks.” (p9)

**What we said:** 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.

**What the plan now says:**

* “As we recover from the pandemic we are working towards achieving net zero in a way which also tackles longstanding challenges and inequalities. We live in challenging times, but better places will be an important part of our response to our strategic priorities of net zero, child poverty and a wellbeing economy. Planning will also play a critical role in delivering the National Strategy for Economic Transformation and in community wealth building.” (Ministerial foreword)
* “Rebalanced development. We will target development to create opportunities for communities and investment in areas of past decline, and manage development sustainably in areas of high demand.” (p.4)
* An assessment of impacts on child poverty and fuel poverty are referenced in most sections of the plan.

**What we said:** 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.

**What the plan now says:**

* “Adverse impacts, including cumulative impacts, of development proposals on the natural environment, will be minimised through careful planning and design, taking into account the need to reverse biodiversity loss. Development proposals for national, major or Environmental Impact Assessment (EIA) development will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks, so they are in a demonstrably better state than without intervention.” (p. 10)
* The LDP spatial strategy should be designed to reduce, minimise or avoid greenhouse gas emissions. (p. 37)
* a) Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible. (policy 2 a, p.37)

**What we said:** 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.

**What the plan now says:**

* The mitigation hierarchy indicates the order in which the impacts of development should be considered and addressed. These are: i. Avoid – by removing the impact at the outset ii. Minimise – by reducing the impact iii. Restore – by repairing damaged habitats iv. Offset – by compensating for the residual impact that remains, with preference to on-site over off-site measures (p.153, Annexe 3)

**What we said:** 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.

**What the plan now says:** The plan says nothing more than was in the first draft. Good points on reducing car mileage and on circular economy / reusing assets, but little on sufficiency

**What we said:** 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.

**What the plan now says:**

* Human Rights listed as one of the key national outcomes of NPF4 (p.6, under liveable places)
* “We have also provided clear support for development that will help to ensure human rights are maintained, for example: Policy 16 on quality homes which addresses the need for accommodation for Gypsy/Travellers and Travelling Showpeople yards, as well as homes for older people and disabled people; and Policy 21 which supports and facilitates spaces and opportunities for play, recreation and sport in our natural and built environments for children and people for all ages.” (p.13)

**What we said:** 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.

**What the plan now says:**

The plan now contains very helpful “CROSS-CUTTING OUTCOME AND POLICY LINKS” pages (see p8 for example)

**What we said:** 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.

**What the plan now says:**

* “The strategy will be taken forward in different ways across Scotland, reflecting the diverse character, assets and challenges of our places. To guide this, we have identified regional spatial priorities for five broad regions of Scotland which will inform the preparation of regional spatial strategies (RSS) and LDPs by planning authorities”
* Document makes regular reference to requirements / expectations that the plan now places on Local development plans

**What we said:** 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

**What the plan now says:**

* “The deployment of hydrogen and CCUS at these locations must demonstrate decarbonisation at pace and cannot be used to justify unsustainable levels of fossil fuel extraction or impede Scotland’s just transition to net zero. Hydrogen and CCUS are emerging industries, both government and industry in Scotland wish to accelerate and maximise the deployment of green hydrogen. For projects that utilise carbon capture and storage, we want to ensure the highest possible carbon capture rates in the deployment of these technologies. While there are examples internationally where CCUS projects have been associated with offshore Enhanced Oil Recovery, we understand there to be no plans for offshore Enhanced Oil Recovery as part of the Scottish Cluster. However, if any IGTZ is found to be incompatible with Scotland’s transition to net zero, Scottish Government policy, along with designations of and classes of development, will change accordingly.” (p.115)