



Stop Climate Chaos Scotland

Written evidence to the Rural Affairs, Climate Change and Environment Committee on the National Planning Framework (NPF3)

February 2014

Stop Climate Chaos Scotland (SCCS) welcomes the opportunity to provide written evidence on the NPF3 to the Rural Affairs, Climate Change and Environment Committee. We welcome the committee's interest in examining whether the NPF3 will help to deliver Scotland's climate change targets and the proposals and policies set out in the Government's second Report on Proposals and Policies (RPP2).

As we outline in this submission, while it is encouraging to see continued commitment from the Scottish Government in the draft NPF3 to delivering on the Climate Change (Scotland) Act 2009, reducing Scotland's emissions and focusing on a low carbon economy, SCCS is concerned that substantial aspects of the framework are inconsistent with this vision.

We believe there are significant contradictions in the draft NPF3 between the Scottish Government's low carbon ambitions and an ongoing focus on carbon intensive activities such as over-reliance on North Sea oil and gas, large road-building programmes and fossil-fuelled power stations. Scotland cannot be low carbon and have an economy based heavily upon fossil fuel extraction and high carbon travel.

The scale of ambition outlined in the Scottish Climate Change Act is correct. In 2009, MSPs unanimously agreed to greenhouse gas emissions reductions based upon global scientific consensus on the minimum levels required to tackle the global problem of climate change. Nonetheless, the targets to reduce Scotland's emissions are challenging and will require considerable leadership and action from the Scottish Government to be realised.

The NPF is one of the key opportunities for this leadership to be clearly set out. At present the framework does not achieve this, as it presents a confused picture of intentions for Scotland's future. The Parliament has made it overwhelmingly clear that in 20-30 years Scotland will be a country with significantly reduced and reducing carbon emissions, setting an example to the rest of the world in how we can tackle the global threat of climate change. It is disappointing that the NPF does not currently support these ambitions of the Parliament.

Scotland needs to rapidly decarbonise our energy supply. This means not only increasing the amount of energy produced from renewable sources but also reducing reliance on fossil fuels. The NPF3 should set out how and when the latter will be achieved alongside the former. Reducing reliance on fossil fuels and increasing renewable energy production must go alongside efforts to reduce overall energy demand in Scotland.

In addition to Scotland decarbonising its energy supply, the ambition must also be for energy which is exported to be from low carbon sources. Exporting energy produced from unabated fossil fuels would still cause the resulting greenhouse gases to end up in the atmosphere, even if not on Scotland's emissions balance sheet. This would be incompatible with Scotland's stance on climate justice.

We do not believe that the Government's overall transport strategy is consistent with the NPF3's stated aim to 'largely decarbonise our transport networks'. This statement is not compatible with the Infrastructure Investment Plan or the Strategic Transport Projects Review, which primarily identify road infrastructure for significant investment.

Planning policy has long-term implications for lifestyles in Scotland. Most planning decisions that are taken now are likely remain for decades to come, certainly within the timeframe of RPP2 and have significant impacts on the sort of country we will be living in by 2027.

Building more roads, potential airport expansion and building out of town shopping centres are likely to increase emissions by encouraging high carbon behaviours, whereas low carbon homes sited near workplace hubs with good public transport facilities can promote low carbon behaviours. The success of measures set out in RPP2 are highly dependent upon behavioural change in this respect and planning has a key role to play in securing the material context for this behavioural change to take place.

Planning authorities should be required to produce a statement setting out how the implementation of development plans and planning consent for major planning applications would result in a net reduction in emissions in the development plan area and contribute to the reduction of emissions across Scotland. In some instances, an increase in emissions may be inevitable. However, in these circumstances the decision must demonstrate how overall national emissions reductions would be delivered through alternative means. This requirement was supported by the Local Government and Regeneration Committee in its report on the RPP2.

For more information please contact:

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Stop Climate Chaos Scotland (SCCS) is a coalition of organisations campaigning on climate change, including environment, faith and development organisations, trade and student unions and community groups.
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