ACA Response to Draft NPF4 Feb 2022

1. General Issues of Note for NPF4

Some issues noted will strongly hinder achievement of the desired results. These are mentioned under the individual points we reviewed, and also mentioned here due to the broader applicability of the principles.

Whilst overall the draft NPF4 recognises the urgent need for policies to tackle the climate emergency, the document leaves it to planners to decide what the priorities are with regard to climate, the economy and the biodiversity crisis. The NPF4 should set out a strong and bold vision for the future of Scotland's land and the kinds of development that can help to realise it. This should start with a stronger definition of the NPF4 outcomes and the changes required to realise each of them.

A just transition towards a fairer, healthier society where we meet the challenges of the climate and biodiversity crises will not be achieved through business as usual. It requires a commitment to fundamentally change many of the ways we currently develop and use our land. A genuinely regenerative, distributive and sustainable economy requires that we stop confusing growth with progress and start valuing a much wider range of social and environmental objectives. The current system rewards the large-scale developer as opposed to local community initiatives: a large-scale project on a greenfield site has a greater chance of success than a locally designed initiative that may be more effective in creating a thriving resilient community. Scotland's planning system should proactively ensure that all new development prioritises people and the planet.

1.1 Business Needs

The concept of "Business needs" is often misinterpreted. The benefit of business is by way of jobs, economic and ecological stability, enhanced value for the community and the nation, and national income. Using "industry need" as a policy consideration is false: policies are there to protect the interests of the nation and the people, and business must work within such boundaries. If business needs conflict with *the **needs and interests of the population***, business needs must be ignored (see also Policy 21: Aquaculture).

1.2 Jobs numbers

To ascertain community benefit, a valid measure might be "long term Jobs per £ annual investment". This measure may be established with a view to avoiding capital and resource-intense and social-benefit-poor developments. Historically fish farms fall in this category, where lax environmental considerations allow internationally unacceptable practices in Scotland. Several of the "National Developments" also carry excessive investment costs for limited positive effect. This does not serve Scottish national interests.

1.3 Targets and Net-Zero

Where targets are mentioned in the document, it must be explicit that ***meeting or exceeding*** targets relating to emissions is called for. Due to the nature of the climate crisis and uncertainties in global actions and climate models, the aim must be to exceed these targets as much as possible.

1.4 National Developments (PART 2)

The questions pertaining to the "National Developments" cover insufficient and irrelevant ground. Several selected "National Developments" are directly opposed to the decarbonising intentions of the NPF4, have the capability to render the entire "net-zero" aim unachievable, and in the process deflect attention and funds from far more effective approaches. The national developments process is clearly dominated by a market driven approach, rather than assessing needs and proactively seeking the right developments

The listing of these National Developments in this framework practically guarantees the failure of the decarbonisation commitment.

The national development criteria need to prioritise net zero and biodiversity and the process of deciding national developments must be open and subject to public scrutiny. We recommend a citizens' assembly to decide the National Developments. As a starting point however, it is recommended that we have Scotland Nature Network as a national development.

1.5 Validity /duration of NPF4

NPF4 is presented as an immutable framework. While the value of this in ordinary circumstances is clear, the Climate Emergency is not an ordinary circumstance. Therefore, a clear overlying principle needs to be described, allowing for changes to the framework wherever

a) the policy shows to have an unforeseen negative impact on emissions.
b) Outcomes prove to be counter-productive for climate and/or other aims.
c) The emissions reductions assumptions may be increased without undue negative outcomes.

The NPF4 should introduce a clear requirement for all new development to be subject to a set of 'public interest tests'. Public Interest Panels, with community representation, could be set up to provide a deliberative means of assessing public interest on large or controversial developments.

There needs to be a change in the presumption for development at the heart of planning currently to one against development unless it is in the public interest and in the Local Development Plan. There needs to be adequate monitoring of developments against the LDP and a right of appeal on proposals contrary to the LDP.

1.6 Public & Community Led Planning

We need a fundamental change in the processes that determine planning decisions. We need to move away from an essentially market-led process where planning regulates private development towards a more positive and proactive commitment to public and community led planning.

As Planning Democracy says:

"Our current system of planning for housing, for example, focuses on reactive, short term market driven fixes to deliver 'housing numbers'. This puts too much emphasis on having a generous (and therefore inefficient) effective land supply in places where developers want to build. Affordable housing provision is overly reliant on section 75 agreements or a trickledown of affordable supply through housing chains. Put simply, our existing housebuilding industry isn't set up to efficiently or effectively build the number, type or quality of new homes we need; they don't necessarily want to build in the places development is most needed or in ways that meet the needs of those unable to pay. The model is volatile, tends towards oligopoly, and the product is unlikely to deliver on climate or biodiversity targets because of its size, quality and location."

We need to move away from what in reality is a development led system where commercial interests dominate every stage of the LDP development and implementation towards a real plan-led system where those plans designate the most suitable sites for development and there is a presumption against development that departs from the plan.

What is needed is more public-led development and proactive allocation of housing sites to ensure land value is efficiently captured and used to enable effective infrastructure provision in the most sustainable locations, where development can strengthen existing communities. New development should be a net positive contribution not a strain on existing places. Competition should be encouraged between developers through selective release of land. Priority should be given in the planning system to social, public and community developers who directly meet the needs of those unable to do so themselves through the market. The planning system should actively encourage experimentation with alternative models of housing delivery, e.g. contracting, self-promotion, community and self-build.

We also need to incorporate deliberative public involvement mechanisms into the participation statement of NPF4.

Transformational methodology: a roadmap for a changing landscape

A time of emergency is not a time of stable long-term plans. What we need now is clarity of purpose and objectives, and flexibility to adjust roadmap, targets and methods on the way. The current draft NPF4 does not reflect these imperatives.

Flexibility and continued updates must be core to the delivery: the decarbonisation of society is not something we can today foresee entirely, and feedback relating to which routes work effectively and which are counterproductive must be sought and responded to.

In an emergency, following a directional framework based on what is effectively a guess about the future is a strategy practically guaranteed to fail.

A framework which is intended to support a huge transformation, must make use of transformational methodology. That includes regular feedback loops and adjustment of targets, aims and methods, multi-layer information dissemination, evaluation, monitoring and implementation adjustment. Anything less is not fit for purpose.

2. CONSULTATION QUESTIONS

This section contains the Aberdeen Climate Action CIC response, and directly follows the issued document "draft-npf4-consultation-questions.docx", the original text of which is listed here in *dark red colour*. The Aberdeen Climate Action CIC responses are given below in the normal black font.

This is a list of consultation questions as they appear in the consultation draft NPF4 and accompanying impact assessments. (This list comprises 11 pages.)
Part 1 - A National Spatial Strategy for Scotland 2045
Sustainable places
Our future net zero places will be more resilient to the impacts of climate change and support recovery of our natural environment.
Q 1: DO YOU AGREE THAT THIS APPROACH WILL DELIVER OUR FUTURE NET ZERO PLACES WHICH WILL BE MORE RESILIENT TO THE IMPACTS OF CLIMATE CHANGE AND SUPPORT RECOVERY OF OUR NATURAL ENVIRONMENT?

If the approach is strictly adhered to, it might work. However, the absence of any reference to industry's excessive influence on government strategy, and of negative impacts of growth and expansion, the precise issues which lie at the root of the Climate Crisis and much of the social inequity, gives reason reason for concern regarding this "summary" for NPF4. As these same industries feature heavily in the rest of the document, often in context unhelpful to the stated intent, this concern appears well-founded.

We are also unsure how this work in practice – these are fundamental changes in decision making criteria, with no mention of economics or commerciality. Sustainable solutions may not be the most commercially attractive ones – how are commercial companies going to be persuaded to align with these decisions when this is the case? How are these changes going to be enforced? This will be very tricky, developers will be reluctant to adapt – thought needs to be given to how this will be done and actually enforced.

Liveable places
Our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live.
Q 2: DO YOU AGREE THAT THIS APPROACH WILL DELIVER OUR FUTURE PLACES, HOMES AND NEIGHBOURHOODS WHICH WILL BE BETTER, HEALTHIER AND MORE VIBRANT PLACES TO LIVE?

The 20-minute neighbourhood concept is valuable, and we agree with and supoport it. It is however a small aspect of achieving "livable places".

The suggestion that the "social legacy" of the COVID-19 pandemic is primary cause of current inadequacy of "places" is extremely concerning: while the pandemic highighted and worsened some of this social legacy, the cause lies far deeper and often points to a lack of constraint on industrial development and influence. Failing to mention either the Climate Crisis -a far greater crisis than the Covid-19 pandemic- or the influence of this industrial legacy on "liveable places" points towards inadequate depth of intent.

Livable places must further consider sustainability over many generations, which means safeguarding against industrial and other "short term" influences.

Liveable places must also have a rural aspect and a translation of the 20ms neighbourhood into a model that can work in an urban setting i.e. a rural hub with good infrastructure and active and public transport links.

Productive places
Our future places will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing.
Q 3: DO YOU AGREE THAT THIS APPROACH WILL DELIVER OUR FUTURE PLACES WHICH WILL ATTRACT NEW INVESTMENT, BUILD BUSINESS CONFIDENCE, STIMULATE ENTREPRENEURSHIP AND FACILITATE FUTURE WAYS OF WORKING – IMPROVING ECONOMIC, SOCIAL AND ENVIRONMENTAL WELLBEING?

The principles set out here are generally supported. However, in the uncertainty of an urgent response to the Climate Emergency, and considering the complexity of the response, creating a top-down pre-selection which *"will play to the economic strengths and opportunities of each part of Scotland"* creates a past driven straitjacket. It lets future development be dictated by history rather than looking forward and reimaging our places. There are opportunities for huge change if places are imagined in a totally different way. This needs government support beyond just planning issues and finance. We need to make sure we don't just perpetuate traditional injustices or distribution of work or create new injustices. We need to think outside the box of existing strengths and opportunities.

Making use of the available strengths seems sensible, but casting the pre-selection in stone for the duration fails to allow for an adequate response to what may actually develop and inhibits visionary thinking. Considering the extraordinary importance of the Climate Crisis, the ability to adjust a ***maximum effective decarbonisation*** approach on the way is of great importance.

Additionally, keeping an open mind to developments outperforming expectation, is the only way for developments to outperform expectation.

Distinctive places
Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient.

Q 4: DO YOU AGREE THAT THIS APPROACH WILL DELIVER OUR FUTURE PLACES WHICH WILL BE DISTINCTIVE, SAFE AND PLEASANT, EASY TO MOVE AROUND, WELCOMING, NATURE-POSITIVE AND RESOURCE EFFICIENT?

The principal ideas are generally supported however there needs to be local community input to making places more distinctive. Additionally, when thinking about green and blue infrastructure and coastal assets, we need to ensure that we involve a long term 'caretaking' view that ensures that we enhance rather than exploit and increase nature rather than create environmental degradation.

Q 5: DO YOU AGREE THAT THE SPATIAL STRATEGY WILL DELIVER FUTURE PLACES THAT OVERALL ARE SUSTAINABLE, LIVEABLE, PRODUCTIVE AND DISTINCTIVE?

There is a lack of clarity of purpose regarding priorities where the scope ranges all the way from "*restore the richness of Scotland's natural environment*" to "*unlock the potential of our coastal assets*". Without clarity on priorities the direction of travel seems unclear and open to misdirection. Without also a clear indication of where communities and developers sit in the decision-making process and how decisions will be enforced it is unclear how this purpose will actually be delivered.

Spatial principles

Q 6: DO YOU AGREE THAT THESE SPATIAL PRINCIPLES WILL ENABLE THE RIGHT CHOICES TO BE MADE ABOUT WHERE DEVELOPMENT SHOULD BE LOCATED?

There still needs more clarity about who is involved, including communities and how these decisions will be enforced.

a) Compact growth – the principle falsely takes "efficiency" as the driver for choice, without defining "efficiency" in this context. The unhelpful current interpretation as "economical efficiency", will defeat the entire intent of NPF4. "Biodiverse efficiency" for example might create stronger incentives to re-use or restore brownfield, vacant or derelict sites.
   "The need to travel unsustainably" has a solution not merely in reducing travel, but in making unsustainable travel impossible.
b) Local Living: "virtual connectivity and active travel" are important as indicated, but alongside sustainable public transport and sustainable freight access in order for these communities to be effective without stifling connection. There needs to be real thought given to ensuring that communities have good travel links with each other not just the area 'capital'/ city/ town.
c) Balanced development –supported.
d) Conserving and recycling assets – supported. In order not to further cement in unequal distribution of funding and resources, we need to build infrastructure and sustainable travel modes in all areas including those that don't have these already, so opportunities are spread around the country.
e) Urban and rural synergy – supported but while the plan talks about bringing nature into towns and cities, it does not discuss how rural areas can access cities or share the benefits of their prosperity and culture and amenities, to which they contribute,

or how prosperity and culture and amenities will be spread from the cities and town to Scotland as a whole.

f) Just transition – as a principle is fully supported. However, the referenced "Just Transition Commission" approach is far too heavily biased towards fossil fuel, and neither supportive of just nor of effective zero carbon transition. A just transition needs to take into account all within the region in a holistic fashion and not have a very narrow view predicated on keeping the oil and gas industry and companies going.

While the principles seem relevant, their content/interpretation misses the necessary systems connection. Without these greater systems interlinks, the framework will not achieve the desired outcome, and will not achieve the required decarbonisation outcome.

Spatial Strategy Action Areas
Q 7: DO YOU AGREE THAT THESE SPATIAL STRATEGY ACTION AREAS PROVIDE A STRONG BASIS TO TAKE FORWARD REGIONAL PRIORITY ACTIONS?

The action areas provide an acceptable basis. There are some issues that need to be a priority in all areas e.g. *Scotland has poor housing stock and badly insulated housing everywhere, but this is only a priority in some areas*.

North and west coastal innovation
Q 8: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

Q 9: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

Northern revitalisation

Q 10: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

Q 11: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

North east transition

Q 12: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

A major challenge not mentioned for the North East area, is the dominant influence of the oil and gas industry on government. This influence is falsely directing the transition in a manner which will fail to achieve either just or climate compatible outcomes. Absence of clarity on the primary aim to "transition to net-zero" fails to correct the false premises.

The related challenge is that new non-carbon-based industries must ***replace*** the existing fossil fuel industries, rather than transform them to "net-zero". While much of the supply

chain will be able to transition, the oil & gas industry is strongly ***incentivised towards failure of climate commitments and of just transition***.

Q 13: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

Action 9 "Transition to net zero" – Most of the actions mentioned are misguided and counterproductive to both climate compatible outcomes and social improvement.

The basic physical misconception is evidenced in the phrase "Greener energy choices, including hydrogen and offshore renewables". Hydrogen is an energy ***carrier*** of low to moderate efficiency, whereas offshore renewables are an energy ***source***. Renewables are an asset, while hydrogen is a potential liability. The suggested need for "a hydrogen network" would depend on a currently non-existent renewables-to-green-hydrogen strategy (Note: the UK government hydrogen strategy is climate-incompatible). The "creation of new capacity" without specifying the hydrogen source is in theory an engineering misconception, in practice a fossil fuel growth strategy. The "blue-hydrogen" pursuit runs counter to the climate goals, and embedding this in NPF4 for the long term is unacceptable.

The "Energy Transition Fund" primarily supports reduced cost levels via reduced jobs in the fossil fuel industry through technical innovation. This is described as "*to protect existing jobs and create new jobs*" but typically causes both net job-loss and the continuation of fossil-fuel industry, against climate requirements. This is a direct consequence of oil industry influence at government level.

The Aberdeen City Deal, and the Aberdeen south harbour development are primarily in support of fossil-fuel growth, through the "blue hydrogen" pursuit, with various elements of minor greenwash included. This is a direct consequence of oil industry influence at government level. We need a rethink of this development to take account of the communities directly affected. We are especially concerned about the impact of potential development on the St Fittick's green area, which is one of the very few remaining areas of greenspace and nature in the area. We think that this should be conserved and enhanced.

The suggestion "*Local people will need to be involved in deciding how potentially significant industrial and business activity can be accommodated alongside regenerating (..)*" is the precise opposite of the current ETZ (Energy Transition Zone) conflict raging in Aberdeen by the new south harbour. This is a direct consequence of oil industry influence at government level. Local people must be involved from the visioning stage onwards in these types of large-scale developments with a huge impact on local communities. Community involvement and agreement should be a fundamental 'legally required' aspect of any planning decision of this scale.

The suggestion that "*It is essential that environmental impacts arising from relocation of the harbour and new construction are carefully managed (..)*" is valid, yet diametrically opposed to the current process and expected outcomes. This is a direct consequence of oil industry influence at government level.

Action 10) improve local liveability – The examples of "new communities" mentioned (Chapelton, Grandhome and Countesswells) are unconnected (by active travel and limited

public transport) greenfield developments with insufficient self-generation and thermal insulation. The majority of them are unconnected to existing communities so have required massive new infrastructure and generated further car travel. So, while the intention to "improve local liveability" is laudable, this approach fails entirely.

The intent of "*connecting with the national long distance cycling and walking network and facilitating active travel*" is laudable, yet seems to fail to include the so necessary common commuting routes in the active-travel approach.

Linking "*new water supply and waste-water systems*" to further (national) development of natural zero carbon waste water treatment technology (available and cost effective elsewhere) could link jobs to local liveability, with an integrated systems approach. This systems approach is lacking in NPF4.

Action 11) regenerate coastal communities – The 20-minute-neighborhood concept, valuable though it is, cannot create this community generation. The absence of any further context other than "offshore renewables and blue economy" lacks value. Connection to e.g., green transport & travel networks is essential to even try to make both these suggestions, and the suggested potential for "cruise and marine leisure sectors", work. The assumption that 20-minute neighbourhoods will remove the need for connection, and then suggest development areas which specifically get no benefit from 20-minute communities is indicative of the piecemeal approach and the absence of systems thinking.

Action 12) decarbonise connectivity – the described approach lacks an understanding of the scale of the climate crisis, as well as imagination regarding solutions. Congestion, in a climate-challenged world, is achieved by reducing road use. This, together with an emissions reduction, is achieved by a strong modal shift to electrified rail.

While city rapid transit (as suggested) may help, if it doesn't conflict with active travel, the piecemeal approach is unhelpful. Building roads, adding city-rapid-transit (in the long term), failing with active travel, and then "*improve journey times*" to the central belt without tackling costs or access in other directions, is unhelpful.

For example, with a substantial modal shift ***as target***, the expansion and further development of public transport and electrified rail become obvious, will feed the just transition, will reduce the need for private vehicles, etc. Once again, a systems approach is required yet wholly absent.

Central urban transformation

Q 14: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

Q 15: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

Southern sustainability

Q 16: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

Q 17: WHAT ARE YOUR VIEWS ON THESE STRATEGIC ACTIONS FOR THIS ACTION AREA?

National Spatial Strategy

Q 18: WHAT ARE YOUR OVERALL VIEWS ON THIS PROPOSED NATIONAL SPATIAL STRATEGY?

Overall, the national spatial strategy lacks purpose and cohesion. While individual points seem largely relevant on their own, the overall plan shows both a lack of vision and one of imagination.

The climate crisis will require society to change in dramatic ways. Disruptive change cannot be planned by looking forward based on whence we came. Disruptive change can only be planned for and understood by starting with the end in mind.

The end will require decarbonised energy, storage, decarbonised transport following huge modal shifts, huge changes in connectivity of energy, goods, people and information, and upheaval in the principles of the economy, communities, living and activities, and land-use.

This NPF-4 draft is a collection of small adaptations, pretending to support delivery of a radically new and different climate-neutral or even climate-negative future. They don't.

This framework remains incremental, and therefore can only fail in its purpose to accommodate the change required for a climate-compatible future.

For a country like Scotland, with abundant resources, land and skills, that is especially disappointing. For future inhabitants of this earth, it is carelessly lethal.

Part 2 - National developments

Q 19: DO YOU THINK THAT ANY OF THE CLASSES OF DEVELOPMENT DESCRIBED IN THE STATEMENTS OF NEED SHOULD BE CHANGED OR ADDITIONAL CLASSES ADDED IN ORDER TO DELIVER THE NATIONAL DEVELOPMENT DESCRIBED?

Overall: the "lifecycle GHG emissions assessment" criterion for all National Developments is ***far too weak***. A "*likely (..) overall net positive impact*" is a disgrace. In a climate emergency, where the aim is future perpetual overall negative emissions, any "National Development" should ***accommodate perpetual zero or negative emissions***. Anything less is wholly inappropriate.

5. Circular Economy Materials Management Facilities – Circular economy material management must have inroads to re-distribution (ownership change) and separately to repair facilities. Continued use, followed by repair, are the top value purposes in the circular economy; missing these out makes a mockery of the "circular economy" designation.

7. Islands Hub for Net Zero – The handling of ultra-large container ships at Scapa flow seems an unlikely inclusion in this list: these ships will not be early to decarbonise, emissions benefits are limited, and global transition should trigger a reduction in goods shipment rather than an increase, and increased weather influences due to climate change will disrupt these vessels disproportionately and so constitute increased environmental risk.

8. Industrial Green Transition Zones – The inclusion of "low carbon hydrogen" in these zones will embed fossil fuel investment well beyond the climate timeline, increase emissions and cause continued fossil fuel dependence. The needs and principles relating to hydrogen in a renewable energy economy are not supported by this fossil fuel growth strategy. While it is a positive sign that caveats relating to CCS and "low carbon" hydrogen are included, these technologies together cannot accommodate perpetual zero or negative emissions and therefore have no place in net-zero Scotland. CCS on its own may be able to play a niche-role for "hard-to-abate" industrial emissions, currently (2019) making up only 2% of UK emissions.

Classification i) "*The application of Carbon Capture and Storage technology to existing or* ***replacement*** *thermal power generation*" has no place on the road to net-zero.
"Replacement" (fossil fuel based) thermal power generation should not be agreed to.

Classification g) "*On or near-shore geological storage of hydrogen*" seems unnecessarily restrictive, by excluding off-shore.

10. Hunterston Strategic Asset – Classification g) insofar it relates to "*low carbon hydrogen*" in this asset is unacceptable; reasoning as under Industrial Transition Zones above.

11. Chapelcross Power Station Redevelopment – Inclusion in classification c) of "low carbon" hydrogen is unacceptable; reasoning as under Industrial Transition Zones above.

15. Aberdeen Harbour – In order to honour social intent of the NPF4, the use of greenfield land near the south harbour should be explicitly excluded. Additionally, though the current draft of NPF4 does not include low-carbon hydrogen, it is essential that low-carbon hydrogen does ***not make its way into the final version of NPF4***.

Q 20: IS THE LEVEL OF INFORMATION IN THE STATEMENTS OF NEED ENOUGH FOR COMMUNITIES, APPLICANTS AND PLANNING AUTHORITIES TO CLEARLY DECIDE WHEN A PROPOSAL SHOULD BE HANDLED AS A NATIONAL DEVELOPMENT?

No. The overall aim of long-term total decarbonisation should be clear and explicit in the needs. We're in a climate emergency, and that is not going away soon.

Q 21: DO YOU THINK THERE ARE OTHER DEVELOPMENTS, NOT ALREADY CONSIDERED IN SUPPORTING DOCUMENTS, THAT SHOULD BE CONSIDERED FOR NATIONAL DEVELOPMENT STATUS?

Yes.

Power transmission infrastructure, to enable green hydrogen generation near point of shipment/export.

Expanded fully electrified rail network: there are glaring missing strategic (rail) connections in the current NPF4 draft including for example Inverness-Ft.William-Oban, Inverness-Ullapool, Oban-Portree/Skye, Aberdeen-Peterhead.

Vehicle Charging Infrastructure, including remote hydrogen generation/storage, also for decarbonised ferry transport.

Part 3 - National Planning Policy

Sustainable Places

We want our places to help us tackle the climate and nature crises and ensure Scotland adapts to thrive within the planet's sustainable limits.

Q 22: DO YOU AGREE THAT ADDRESSING CLIMATE CHANGE AND NATURE RECOVERY SHOULD BE THE PRIMARY GUIDING PRINCIPLES FOR ALL OUR PLANS AND PLANNING DECISIONS?

We strongly support this focus. However, it is not clear how these aims, together with local community concerns and aspirations, will come to the fore instead of the short-term, profit-led aims of developers, which have traditionally prevailed.

Policy 1: Plan-led approach to sustainable development

Q 23: DO YOU AGREE WITH THIS POLICY APPROACH?

We strongly support a plan-led approach based on long term public interest, and in line with the SDG's.

Policy 2: Climate emergency

Q 24: DO YOU AGREE THAT THIS POLICY WILL ENSURE THE PLANNING SYSTEM TAKES ACCOUNT OF THE NEED TO ADDRESS THE CLIMATE EMERGENCY?

No. The policy is too weak on exceptions under *c) development proposals that will generate significant emissions*. Both the acceptance and the offsetting options are insufficient restrictive. While nature-based negative emissions applications should be supported on their own, using these as an excuse to create excessive emissions elsewhere is unacceptable.

Policy 3: Nature crisis

Q 25: DO YOU AGREE THAT THIS POLICY WILL ENSURE THAT THE PLANNING SYSTEM TAKES ACCOUNT OF THE NEED TO ADDRESS THE NATURE CRISIS?

No. The exclusion from clauses d) and e) for farmed fish or shellfish development are unacceptable and random. It is wholly unacceptable to exclude of an historically environmentally destructive industry from the overall good intent. The sheer proposition reeks of corruption and warrants investigation.

The exclusion of individual householder development needs restricting or removing also: there are many possible ways in which to enhance biodiversity.

Policy 4: Human rights and equality

Q 26: 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?

Policy 5: Community wealth building

Q 27: DO YOU AGREE THAT PLANNING POLICY SHOULD SUPPORT COMMUNITY WEALTH BUILDING, AND DOES THIS POLICY DELIVER THIS?

Yes, community wealth building should be supported.

No, this clause does not support that. The community wealth increase must be permanent, or at the very least of long term multi-generational benefit to the community.

Policy 6: Design, quality and place

Q 28: DO YOU AGREE THAT THIS POLICY WILL ENABLE THE PLANNING SYSTEM TO PROMOTE DESIGN, QUALITY AND PLACE ?

Policy 7: Local living

Q 29: DO YOU AGREE THAT THIS POLICY SUFFICIENTLY ADDRESSES THE NEED TO SUPPORT LOCAL LIVING?

The onus in b) "*Development proposals that are consistent with the principles of 20 minute neighbourhoods should be supported*" seems to conflict with the presumption against development.

The failure to mention active and public transport connection ***between*** 20-minute neighbourhoods and other regions opens the policy up to undesired outcomes.

Policy 8: Infrastructure First

Q 30: DO YOU AGREE THAT THIS POLICY ENSURES THAT WE MAKE BEST USE OF EXISTING INFRASTRUCTURE AND TAKE AN INFRASTRUCTURE-FIRST APPROACH TO PLANNING?

The gap in clause c) "provide infrastructure that is identified as necessary in LDPs" is where the LDP does not align with the climate goals, and in such circumstances the LDP must be overruled.

Policy 9: Quality homes

Q 31: DO YOU AGREE THAT THIS POLICY MEETS THE AIMS OF SUPPORTING THE DELIVERY OF HIGH QUALITY, SUSTAINABLE HOMES THAT MEET THE NEEDS OF PEOPLE THROUGHOUT THEIR LIVES?

No. A 25% affordable home fraction is too low for resolving the housing crisis, equity and inequality.

Thermal characteristics, energy self-sufficiency and longevity should be guaranteed and proven to exceed the regulatory building requirements, and on failure retrofitted prior to completion.

How does this policy on land use fit in with Policy 3, supporting the nature crisis?

The definitions need to be tighter with a high-quality home being a net zero

Home. How can community benefits be enforced so the developer actually pays them? There needs to be mechanism of escrow together with a percentage of the profits going into the fund.

Buildings need to adhere to the planning and building regulations in operation when they are built not when they get planning permission. Many houses are built years after planning consent and so built to lower standards than are then current.

The LDP is to identify housing targets, but this shouldn't just be a numbers game, communities need to be able to decide on what kinds of homes they need.

There is a requirement that developments should provide or enhance local infrastructure, facilities, and services without saying how this will be achieved in practice. This needs to be spelled out.

Policy 10: Sustainable transport

Q 32: DO YOU AGREE THAT THIS POLICY WILL REDUCE THE NEED TO TRAVEL UNSUSTAINABLY, DECARBONISE OUR TRANSPORT SYSTEM AND PROMOTE ACTIVE TRAVEL CHOICES?

The policy touches on many important points, but lacks some commitment.

For clauses c) and d) relating to developments which "*generate a significant increase in the number of person trips*", the aim should be to ensure that at least e.g. 90% of those trips are by sustainable means, including active travel and public transport.

Clause f) might add the requirement for safe public transport and active travel access from any new junctions or trunk roads.

Clause g) relating to "*the number and speed of vehicles*" must avoid detrimental impact on current emissions – redirecting traffic can increase emissions.

Clause i) relating to cycle parking must include sufficient parking space for all foreseen users in the long term, including space for future expansion as required. An additional clause relating to the simple future conversion of parking space to green space might help with water management/soakaways.

Policy 11: Heat and cooling

Q 33: DO YOU AGREE THAT THIS POLICY WILL HELP US ACHIEVE ZERO EMISSIONS FROM HEATING AND COOLING OUR BUILDINGS AND ADAPT TO CHANGING TEMPERATURES?

Focus on stimulating heat-networks is very helpful. Introductory examples relating to waste heat sources should clarify that "non-eternal" sources of waste heat must be replaceable by zero-emissions systems; e.g. decarbonizing the waste water system may remove it as source of waste heat.

Similarly in clause h) "*repurpose former fossil fuel infrastructure*" the impact may be counter-productive: the benefit of usable "waste-heat" may be negligible compared with the inefficiency of the main proposal– total non-sustainable energy use should be considered for such (all) proposals.

Heating buildings will only be cost and energy efficient if those buildings are properly insulated. They will not be insulated without funding, e.g., government loans that are paid back when the house is sold, or training tradespeople to carry out this work to the highest standard. Both things require government intervention, planning and financing.

Policy 12: Blue and green infrastructure, play and sport

Q 34: DO YOU AGREE THAT THIS POLICY WILL HELP TO MAKE OUR PLACES GREENER, HEALTHIER, AND MORE RESILIENT TO CLIMATE CHANGE BY SUPPORTING AND ENHANCING BLUE AND GREEN INFRASTRUCTURE AND PROVIDING GOOD QUALITY LOCAL OPPORTUNITIES FOR PLAY AND SPORT?

Policy 13: Sustainable flood risk and water management

Q 35: DO YOU AGREE THAT THIS POLICY WILL HELP TO ENSURE PLACES ARE RESILIENT TO FUTURE FLOOD RISK AND MAKE EFFICIENT AND SUSTAINABLE USE OF WATER RESOURCES?

We agree with the policy measures about flooding but they are limited to the built environment. It does not include the natural environment or broader aspects. Planning needs to think more holistically and look at land use, especially in uplands and river catchments, and how that can worsen or mitigate flooding risks.

Policies 14 and 15: Health, wellbeing and safety

Q 36: DO YOU AGREE THAT THIS POLICY WILL ENSURE PLACES SUPPORT HEALTH, WELLBEING AND SAFETY, AND STRENGTHEN THE RESILIENCE OF COMMUNITIES.

Policy 16: Land and premises for business and employment

Q 37: DO YOU AGREE THAT THIS POLICY ENSURES PLACES SUPPORT NEW AND EXPANDED BUSINESSES AND INVESTMENT, STIMULATE ENTREPRENEURSHIP AND PROMOTE ALTERNATIVE WAYS OF WORKING IN ORDER TO ACHIEVE A GREEN RECOVERY AND BUILD A WELLBEING ECONOMY?

Policy 17: Sustainable tourism

Q 38: DO YOU AGREE THAT THIS POLICY WILL HELP TO INSPIRE PEOPLE TO VISIT SCOTLAND, AND SUPPORT SUSTAINABLE TOURISM WHICH BENEFITS LOCAL PEOPLE AND IS CONSISTENT WITH OUR NET-ZERO AND NATURE COMMITMENTS?

Policy 18: Culture and creativity

Q 39: DO YOU AGREE THAT THIS POLICY SUPPORTS OUR PLACES TO REFLECT AND FACILITATE ENJOYMENT OF, AND INVESTMENT IN, OUR COLLECTIVE CULTURE AND CREATIVITY?

Policy 19: Green energy

Q 40: DO YOU AGREE THAT THIS POLICY WILL ENSURE OUR PLACES SUPPORT CONTINUED EXPANSION OF LOW CARBON AND NET-ZERO ENERGY TECHNOLOGIES AS A KEY CONTRIBUTOR TO NET-ZERO EMISSIONS BY 2045?

No. It is a good start but the scope for abuse, against the public decarbonisation interest, is substantial. The intent to support "*emerging technology including hydrogen and carbon capture utilisation and storage (CCUS)*" is based on the ***false*** premises that ***any*** hydrogen delivers a positive contribution to the targets, and similarly that CC(U)S does so, both now and towards the end of the validity of this NPF4. However, these technologies, if they have validity in a decarbonising world at all -which is hotly debated in the engineering world- are unlikely to have that validity beyond 2030 due to both cost and residual emissions of the gas production process and process leakage. Both technologies are highly implementation dependent, only valid for pre-transition trajectory, and many applications can in fact prevent the country from achieving its targets. Furthermore, as the investment timespan is typically greater than 30 years these technologies will continue to damage the climate, well beyond 2045.

A safeguard such as "if such technology can in the long term achieve overall zero (not net-zero) emissions, ***and*** if such technology does not unduly displace decarbonised energy from other applications" is required to prevent such likely unwanted climate impacts.

Clause b) refers to "*low-carbon fuels"* which is incompatible with achieving net-zero by 2045 as indicated.

Clauses c), d) and e) relating to windfarms should consider the status of decarbonisation and the role the project may play in this: given a choice between climate failure and an unscenic view, the latter should be preferred. Impacts on people and communities must still need consideration however, and choices may need to be made as part of the e.g. the NPF4.

Clause i) "Proposals for negative emissions technologies and carbon capture should be supported in principle", must include safeguards to prevent e.g. DAC (Direct Air Capture) projects from reducing renewables availability where they are essential for decarbonisation of society. DAC projects are without exception based on commercial offsetting of emissions,

not on helping society get to net-zero. Additionally, they are known to carry a large opportunity cost to the detriment of decarbonisation.

Policy 20: Zero waste

Q 41: DO YOU AGREE THAT THIS POLICY WILL HELP OUR PLACES TO BE MORE RESOURCE EFFICIENT, AND TO BE SUPPORTED BY SERVICES AND FACILITIES THAT HELP TO ACHIEVE A CIRCULAR ECONOMY?

No. The top level of the circular economy is re-use of product. This features well above re-use of the constituent materials, yet the policy doesn't touch on it. Prescribing selection for re-use and repair (minimising waste) prior to waste management is critical. The "*Zero waste*" heading above waste "management" facilities, where e.g. clause e) suggests "acceptable levels of land, air, water pollution" exist at all, is just not right.

These policies do not support a circular economy, yet appear to favour conventional industrial waste "management".

We support the idea that new infrastructure should only be built in appropriate locations. The issue is who decides which locations are appropriate and how the community can have a say in this. We have seen inappropriate location of industrial development in Torry, Aberdeen, a community that seems to bear the brunt of industrial developments in Aberdeen and have no voice. Communities need to be involved in the decision making process.

Policy 21: Aquaculture

Q 42: DO YOU AGREE THAT THIS POLICY WILL SUPPORT INVESTMENT IN AQUACULTURE AND MINIMISE ITS POTENTIAL IMPACTS ON THE ENVIRONMENT?

No. This policy is completely alien to the intent of the NPF4. This is clear from the very introduction, which looks to "*support the prosperity of the finfish, shellfish and seaweed sectors, including by guiding new development to locations that reflect industry needs*" rather than the places and the people involved. This is contextually accurate, as the current aquaculture industry is largely foreign held, strongly and unnecessarily polluting, and extracting and exporting the maximum of any potential benefits.

The full focus is on "industry needs", and the content of the policy clauses primarily balances on the word "appropriate".

While aquaculture in principle can indeed play an important role in Scotland's sustainable future within climate boundaries, with employment benefits in remote regions, this policy seems a shocking empty vessel in support of industrial polluting exploitation of people and animals alike without regard for climate or environment.

While it may be improved by e.g. suggesting that aquaculture needs full environmental impact assessment from a reputable Scottish marine research institute such as SAMS,

signed off on climate-positive, biodiversity-positive and positive fair-employment impacts, this policy contains little substance to build on.

Policy 22: Minerals

Q 43: DO YOU AGREE THAT THIS POLICY WILL SUPPORT THE SUSTAINABLE MANAGEMENT OF RESOURCES AND MINIMISE THE IMPACTS OF EXTRACTION OF MINERALS ON COMMUNITIES AND THE ENVIRONMENT?

Policy 23: Digital infrastructure

Q 44: DO YOU AGREE THAT THIS POLICY ENSURES ALL OF OUR PLACES WILL BE DIGITALLY CONNECTED?

Policies 24 to 27: Distinctive places

Q 45: DO YOU AGREE THAT THESE POLICIES WILL ENSURE SCOTLAND'S PLACES WILL SUPPORT LOW CARBON URBAN LIVING?

No. While the core interest of development in city centres over remote shopping clusters is clear and supported, the absence of reference to green space, brownfield, and public recreational space doesn't support low carbon living.

Policy 28: Historic assets and places

Q 46: DO YOU AGREE THAT THIS POLICY WILL PROTECT AND ENHANCE OUR HISTORIC ENVIRONMENT, AND SUPPORT THE RE-USE OF REDUNDANT OR NEGLECTED HISTORIC BUILDINGS?

We support these aims with the proviso that old buildings need bringing up to date; historic buildings whether listed or in conservation areas should be allowed to e.g. install double glazing or use modern materials for heat conservation.

Policy 29: Urban edges and the green belt

Q 47: DO YOU AGREE THAT THIS POLICY WILL INCREASE THE DENSITY OF OUR SETTLEMENTS, RESTORE NATURE AND PROMOTE LOCAL LIVING BY LIMITING URBAN EXPANSION AND USING THE LAND AROUND OUR TOWNS AND CITIES WISELY?

Most of the policy supports the cause. However, in clause b) "*proposals within a green belt*" the strange exclusion for "retired workers" completely defeats the long-term intent of the NPF4 – Surely retired workers are expected to die in the near future, and their newly built luxury green-belt houses then sold free from encumbrance to the highest bidder. This sounds like a pre-meditated scheme to allow e.g. golf courses to build in green belt either for future sale or as club captain's perk.

Policy 30: Vacant and derelict land

Q 48: DO YOU AGREE THAT THIS POLICY WILL HELP TO PROACTIVELY ENABLE THE REUSE OF VACANT AND DERELICT LAND AND BUILDINGS?

Yes.

Policy 31: Rural places

Q 49: DO YOU AGREE THAT THIS POLICY WILL ENSURE THAT RURAL PLACES CAN BE VIBRANT AND SUSTAINABLE?

Policy 32: Natural places

Q 50: DO YOU AGREE THAT THIS POLICY WILL PROTECT AND RESTORE NATURAL PLACES?

Policy 33: Peat and carbon rich soils

Q 51: DO YOU AGREE THAT THIS POLICY PROTECTS CARBON RICH SOILS AND SUPPORTS THE PRESERVATION AND RESTORATION OF PEATLANDS?

Policy 34: Trees, woodland and forestry

Q 52: DO YOU AGREE THAT THIS POLICY WILL EXPAND WOODLAND COVER AND PROTECT EXISTING WOODLAND?

Policy 35: Coasts

Q 53: DO YOU AGREE THAT THIS POLICY WILL HELP OUR COASTAL AREAS ADAPT TO CLIMATE CHANGE AND SUPPORT THE SUSTAINABLE DEVELOPMENT OF COASTAL COMMUNITIES?

Part 4 - Delivery

Delivering our spatial strategy

Q 54: DO YOU AGREE WITH OUR PROPOSED PRIORITIES FOR THE DELIVERY OF THE SPATIAL STRATEGY?

Q 55: DO YOU HAVE ANY OTHER COMMENTS ON THE DELIVERY OF THE SPATIAL STRATEGY?

A time of emergency is not a time of stable long-term plans. These times are times for a clarity of objectives, a clarity of purpose, and flexibility to adjust roadmap, targets and methods on the way. These times require much more than this NPF4.

Flexibility and continued updates must be core to the delivery: the decarbonisation of society is not something we can today foresee entirely, and feedback relating to which routes work effectively and which are counterproductive must be sought and responded to. In an emergency, following a directional framework based on what is effectively a guess about the future is a strategy practically guaranteed to fail.

A framework which is intended to support a huge transformation must make use of transformational methodology. That includes regular feedback loops and adjustment of targets, aims and methods, multi-layer information dissemination, evaluation, monitoring and implementation adjustment.

Anything less is not fit for purpose.

Part 5 - Annexes

Annex A

Q 56: DO YOU AGREE THAT THE DEVELOPMENT MEASURES IDENTIFIED WILL CONTRIBUTE TO EACH OF THE OUTCOMES IDENTIFIED IN SECTION 3A(3)(c) OF THE TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997?

Annex B

Q 57: DO YOU AGREE WITH THE MINIMUM ALL-TENURE HOUSING LAND REQUIREMENT (MATHLR) NUMBERS?

Annex C

Q 58: DO YOU AGREE WITH THE DEFINITIONS SET OUT IN THE GLOSSARY? ARE THERE ANY OTHER TERMS IT WOULD BE USEFUL TO INCLUDE IN THE GLOSSARY?

INTEGRATED IMPACT ASSESSMENTS

Environmental Report

Q 59: WHAT ARE YOUR VIEWS ON THE ACCURACY AND SCOPE OF THE ENVIRONMENTAL BASELINE SET OUT IN THE ENVIRONMENTAL REPORT?

Q 60: WHAT ARE YOUR VIEWS ON THE PREDICTED ENVIRONMENTAL EFFECTS OF THE DRAFT NPF4 AS SET OUT IN THE ENVIRONMENTAL REPORT? PLEASE GIVE DETAILS OF ANY ADDITIONAL RELEVANT SOURCES.

Q 61: WHAT ARE YOUR VIEWS ON THE POTENTIAL HEALTH EFFECTS OF THE PROPOSED NATIONAL DEVELOPMENTS AS SET OUT IN THE ENVIRONMENTAL REPORT?

Q 62: WHAT ARE YOUR VIEWS ON THE ASSESSMENT OF ALTERNATIVES AS SET OUT IN THE ENVIRONMENTAL REPORT?

Q 63: WHAT ARE YOUR VIEWS ON THE PROPOSALS FOR MITIGATION, ENHANCEMENT AND MONITORING OF THE ENVIRONMENTAL EFFECTS SET OUT IN THE ENVIRONMENTAL REPORT?

Society and Equalities Impact Assessment

Q 64: WHAT ARE YOUR VIEWS ON THE EVIDENCE AND INFORMATION TO INFORM THE SOCIETY AND EQUALITIES IMPACT ASSESSMENT?

Q 65: DO YOU HAVE ANY COMMENTS ON THE FINDINGS OF THE EQUALITIES IMPACT ASSESSMENT?

Q 66: DO YOU HAVE ANY COMMENTS ON THE FINDINGS OF THE CHILDREN'S RIGHTS AND WELLBEING IMPACT ASSESSMENT?

Q 67: DO YOU HAVE ANY COMMENTS ON THE FAIRER SCOTLAND DUTY AND THE DRAFT NPF4?

Q 68: DO YOU HAVE ANY COMMENTS ON THE CONSIDERATION OF HUMAN RIGHTS AND THE DRAFT NPF4?

Q 69: DO YOU HAVE ANY COMMENTS ON THE ISLANDS IMPACT ASSESSMENT?

Business and Regulatory Impact Assessment

Q 70: DO YOU HAVE ANY COMMENTS ON THE PARTIAL BUSINESS AND REGULATORY IMPACT ASSESSMENT?

CONSULTATION QUESTIONS ENDS