



Climate Emergency Response Group Briefing

Local Government, Housing and Planning Committee

Annual check-up on NPF4

14 May 2024

Summary

The [Climate Emergency Response Group](#) (CERG) is a collective of climate leaders spanning Scotland's private, public and third sectors, using its experience to inform and influence the Scottish Government's response to the climate emergency.

CERG believes the effective implementation of the National Planning Framework (NPF4) will have hugely beneficial impacts for Scotland - both in terms of reducing emissions, adapting to climate impacts and addressing the nature crisis. It will also pave the way for jobs and business opportunities in the green economy. Already it has raised the profile of the significance of the climate emergency in planning decisions.

CERG welcomes the Local Government, Housing and Planning Committee undertaking an annual review of the extent to which NPF4 is achieving its ambitions.

However, it appears to be too early to tell if the NPF4 and Policy 2 on the climate emergency is perceived to have 'teeth'. We are concerned that any delays in implementing Policy 2 will lead to avoidable risks of building high carbon infrastructure, locking in fossil-fuel dependent behaviours, and making people and assets vulnerable to climate impacts.

In this briefing we raise the following concerns and recommendations:

- **Accelerate the completion of guidance** for Policy 2 (climate mitigation and adaptation)
- Along with the guidance, **issue a Chief Planner letter** to local authorities to emphasise importance of addressing the climate emergency in all planning decisions immediately, and make clear the Scottish Government intentions to call in major developments where climate impacts (mitigation and/or adaptation) haven't been properly considered.
- In the interim, the Chief Planner should encourage use of existing government guidance on carbon assessment for significant infrastructure and National Developments
- Address gaps in planning skills through **regional and/or central hubs** which would allow drawdown expertise and capacity, especially in specialist areas of assessing climate mitigation and adaptation impacts and biodiversity impacts.
- **Apply a Net Zero Test for policy and investment decisions** in planning will allow standardisation of measurement and aggregation of climate emissions/ net zero impacts across projects and programmes.

Background

Planning and consent policy is critical to supporting the transition to net-zero – for example through encouraging developments for walking, cycling and use of public transport, ensuring readiness for installation of electric vehicle charging points, and a favourable planning regime for low-cost renewables, particularly onshore wind. It can also support resilience to the impacts of climate change by guiding investment in blue and green infrastructure.

Clear planning policy which provides certainty and timely decision-making for private investors and developers will create job and business opportunities across all sectors. For example:

- The growth of the renewables sector offers huge potential for jobs, manufacturing, and export opportunities.
- The retrofit and decarbonisation of buildings will provide thousands of jobs distributed all over Scotland. Addressing the planning process will mean that more homeowners and tenants can benefit from warmer, low carbon homes, faster and at a lower cost. This will help address fuel poverty and its negative impacts on health and well-being.
- Planning can facilitate the repurposing of buildings in city centres as businesses and residents change the way buildings are used, addressing inequalities by providing much needed housing in cities.
- Planning can also facilitate developments at densities and in locations that promote liveability and green space while avoiding locking people into car dependency

The effective delivery of Policy 1: *'gives significant weight to the global climate emergency in order to ensure that it is recognised as a priority in all plans and decisions'* and Policy 2: *'ensure that emissions from new development are minimised as far as possible'* together are key. Progress is being made in developing Guidance to deliver Policy 2 – but it remains unclear what tools / decision-making processes will ensure 'significant weight' is given across all plans and decisions. CERG argues that a Net Zero Test across all policy, investment and procurement decisions will enable delivery of {Policies 1 and 2}.

Policy 2 – mitigation and adaptation – guidance

Clear guidance and leadership in the implementation of this Policy are critical to support decision makers and attract private investment. Implementation of Policy 2 requires an understanding of, and action to minimise, the impacts of developments on greenhouse gas emissions across spatial scale. The Planning & Climate Change Guidance should:

- set an unequivocal signal for developers - the presumption is that permission will not be granted for developments which 'lock in' high carbon behaviours or developments that fail to incorporate adaptation to climate impacts in their design. This policy certainty will influence developers to support placemaking approaches and 20-minute neighbourhoods.

- The guidance should also refer to a decision-making process which acknowledges the need to act quickly to respond at a pace that matches the climate emergency.
- Require the use of standardised, quantitative carbon assessment methods that can be aggregated across projects, to programme and across spatial scales.

These methods can generate transparent evidence of how NPF4 has fulfilled its commitments that Local Development Plan spatial strategies will reduce emissions (Policy 1), and lifecycle GHG emissions are minimised as far as possible (Policy 2). Quantified tools provide the evidence required by Ministers and Scottish Government oversight bodies to ‘call in’ developments that don’t align with national priorities and climate targets (see later). The guidance should include embodied carbon and how that should be incorporated in decision-making. This is important in terms of building retrofit and decarbonisation.

- We need to acknowledge the importance of climate risk screening at the earliest point too. There are huge risks of wasting investment / having to retrofit if future impacts from climate change not factored into decisions about location, design and services.

We understand the NPF4 Delivery Programme is working on guidance for Policy 2 and has commissioned: *“research to look into identifying relevant information sources, tools, methods and approaches (including qualitative and quantitative) that can be used to demonstrate whether and how lifecycle greenhouse gas emissions of development proposals have been minimised. In particular, a focus is being given to information sources, tools, methods and approaches that can support developers in informing the siting and design of development proposals, as well as decision makers in determining planning applications.”*¹

An expert working group is working with officials to develop the guidance through an iterative process. This is a positive development but needs to be accelerated as there is a risk that some planning authorities will develop their own guidance – leading to disparity in approaches across Scotland. As an interim measure, the government can signpost to existing tools, such as the City Region and Growth Deal Carbon Assessment Guidance², that can be used.

¹ <https://www.transformingplanning.scot/national-planning-framework/implementing-npf4/>

² <https://www.gov.scot/publications/scottish-city-region-growth-deals-carbon-management-guidance-projects-programmes/>

Leadership from Chief Planners

Planners and elected members want to ‘do the right thing’ and guidance will help in this regard. CERG welcomes the training of elected members, and local Chief Planners – strengthening local leadership and commitment. The Scottish Government could emphasise the importance of applying the guidance by issuing a Chief Planner letter to local authorities stating the government’s intention to call in major developments where climate impacts (mitigation and adaptation) haven’t been properly considered.

The Scottish Government should also lead by example through applying the carbon assessment guidance to the development of its Infrastructure Investment Plan.

Capacity and Expertise through Regional Hubs

There is significant concern that the planning system (local authority planners, statutory consultees) suffers from a lack of capacity and expertise. In some cases, this means it has become a bottleneck for taking forward projects that would support the net zero transition. In others, the consideration of net zero and climate risk has come too late in the process and becomes a damage limitation exercise.

We note that NPF4 Delivery programme talks about a skills strategy – we would like to know where is this.

We welcome the attention brought to this issue in the Scottish Government consultation on Resourcing Scotland’s Planning System. Many solutions will take time to build the profession, and interim measures need to be brought in quickly to plug the gap – for example regional hubs for draw down expertise or other shared resourcing measures across the public sector. This approach has been applied for building regulations and would work well for carbon assessment, also drawing on the new Climate Intelligent Service.³

Use the ‘Net Zero Test’⁴ to prioritise the climate crisis across plans and projects (Policy 1)

Policy 2 guidance is a key step forward as it means emissions are considered as part of the development process for planned developments. This is a project level carbon assessment tool – like that used in the City Deals. These tools are the backbone of being able to quantify and reduce emissions and are already widely used across the public sector. Mandating the use of carbon assessment would be a big step up from what we already have.

However CERG believes that we also need to think about a process that is more than individual projects – a mechanism is needed to look across projects, programmes, portfolios to determine whether the aggregate impact of all these discrete projects pushes Scotland over an emissions threshold –both in terms of direct emissions and whole life carbon emissions.

³ <https://www.improvementservice.org.uk/news/november-2023/new-climate-intelligence-service-will-support-councils-to-deliver-local-climate-action>

⁴ <https://cerg.scot/wp-content/uploads/2023/10/CERG-Report-August-2023.pdf> (CERG Net Zero Test proposals on p 7)

Conclusion

NPF4 represents the biggest overhaul in Scotland's planning system in a generation. Without a doubt, it has given the climate emergency its proper place as a matter for significant consideration in planning decisions. Given the long-term impact of planning decisions today on how we will live in the future it is crucial that we get it right. Housing, schools, transport links, greenspaces – their location, design, and interaction with each other will decide if we can live with a smaller carbon footprint or not. NPF4 has set out good policies and now we need the guidance, resources, and monitoring to ensure they are implemented in a way to achieve a net zero and prosperous future.