

SUBMISSION FROM SEPA

I refer to your Committee's call for evidence for its inquiry into National Planning Framework 2 (NPF2) on certain matters¹. SEPA welcomes the opportunity to contribute to this inquiry and encloses written evidence which focuses on four key areas of direct interest to the Agency.

First, the Government's established policies reflected in NPF2 *broadly* support the key aims of Scotland's spatial development strategy to 2030. However, a stronger relationship between Government's 'wealthier and fairer' and 'greener Scotland' strategic objectives is desirable across two thematic areas – national waste installations and road transport emissions, not least to support Scotland's climate change targets.

Second, on the issue of whether NPF2 strikes the correct balance between economic development and environmental protection, SEPA believes that in a forward-looking, visionary and ambitious planning system, these need not be competing objectives. The Agency very much looks forward to working collaboratively with Government and other partners to enable delivery of all proposed national developments and spatial development priorities in the right location and with appropriate mitigation of environmental effects.

Third, SEPA considers that all of the proposed national developments qualify insofar as they each satisfy *at least one* of the criteria set out in the statement to Parliament on 13 September 2007.

Fourth, SEPA supports the key priorities for regional development as set out in the spatial perspectives section of NPF2, particularly those with a strong environmental dimension.

Further detail and supporting information is contained in Annex 1 to this letter.

As a public body committed to openness and transparency, SEPA feels it is appropriate that this response be placed on the public record.

Campbell Gemmell
Chief Executive

¹ As set out in the [call for evidence](#) on the Committee's web pages.

SCOTTISH ENVIRONMENT PROTECTION AGENCY

Written Evidence Annex 1 National Planning Framework 2

Conclusions / Recommendations

- 1.1 To better integrate Government's 'wealthier and fairer' and 'greener Scotland' strategic objectives relative to *sustainable economic growth* and *climate change aims of the NPF2 spatial development strategy*, it would be desirable to see Government commit to early delivery of any national waste installations identified in the forthcoming revised National Waste Plan, even if that requires Scottish Ministers to commit to an early review of the Framework (e.g. within 3 rather than 5 years of publishing NPF2).
- 1.2 To better integrate Government's 'wealthier and fairer' and 'greener Scotland' strategic objectives relative to *improved connectivity* and *climate change aims of the spatial development strategy*, it would be desirable to see Government at least aspire to stabilise road traffic growth as a complementary measure to support land based transport emission reductions via improved accessibility and modal shift.
- 1.3 Putting aside the absence of any commitment to stabilise road traffic growth, SEPA acknowledges that NPF2 has probably gone as far as it can do in terms of promoting a balanced *spatial* development strategy and, as a consequence of the Strategic Environmental Assessment process, the Framework now suitably addresses mitigation of adverse environmental effects as far as practicable at this stage.
- 1.4 In the spirit of working collaboratively with Government and other partners to enable timely delivery of all proposed national developments and spatial development priorities, SEPA will identify a senior coordination manager to give oversight and direction on those proposed national developments in which the Agency needs to provide a significant role.

1. Supporting Information

2.1 Scope of SEPA's written evidence

2.1.1 SEPA's written evidence focuses on four of the six matters detailed in the Committee's call for evidence:

1. whether the policies set out in the NPF2 support the Government's key aims for the development of Scotland to 2030
2. whether the correct balance has been struck between economic development and environmental protection
3. whether the proposals listed as potential national developments meet the criteria set out by Ministers in a statement to Parliament on 13 September 2007
4. the key priorities for regional development set out in the spatial perspectives section.

2.2 Do the policies set out in NPF2 support the Government's key aims for the development of Scotland to 2030?

2.2.1 NPF2 expresses and coordinates *established* Government policies with a spatial dimension, as opposed to *new* policies. In particular, Government's commitment to sustainable development is reflected in its current policies on matters such as climate change, transport, renewable energy, energy efficiency, waste management and biodiversity. Hence, the established policies reflected in the Framework broadly support

the key aims of Scotland's spatial development strategy to 2030 as set out in [paragraph 43](#)² of NPF2.

2.2.2 However, a stronger relationship between Government's 'wealthier and fairer' and 'greener Scotland' strategic objectives is desirable across two specific thematic areas – national waste installations and road transport emissions.

2.2.3 Taking first the relationship between the *sustainable economic growth* and *climate change* aims of the spatial development strategy relative to waste, SEPA welcomes the emphasis that NPF2 places on the development of a *strategic* network of waste management installations ([paragraph 166 refers](#)). However, the Agency notes that *national installations* to deal with particular waste streams (i.e. potentially municipal, commercial and industrial) will not come forward as national developments until the third National Planning Framework (i.e. 2014 potentially). It would be desirable to see Government commit to early delivery of any national waste installation needs identified in the forthcoming revised National Waste Plan, even if that requires Scottish Ministers to early review the Framework (e.g. within 3 rather than 5 years of publishing NPF2).

2.2.4 The National Waste Plan, whilst a material planning consideration, is not a statutory land use planning document. It cannot match the weight that the Framework has in signalling proposed national waste developments or in providing national spatial direction to planning authorities and the development industry on waste infrastructure requirements. SEPA believes that the NPF2 Action Programme may at least provide some scope to agree early actions to help fill the current void on treatment capacity requirements for commercial and industrial waste at both regional and national levels.

2.2.5 Turning to the relationship between the *improved connectivity* and *climate change* aims of the spatial development strategy, reducing emissions from transport sources³ is a welcome objective as stated in [paragraph 21](#) of NPF2 and will play a big part in achieving Scotland's climate change targets. However, without a parallel commitment to stabilise road traffic growth, measures to improve accessibility and encourage a shift to more sustainable forms of transport are unlikely to optimise that emissions reduction objective.

2.2.6 Paragraph 20 of NPF2 states: "*Transport (excluding aviation) accounts for over 20% of Scottish greenhouse gas emissions and is the fastest growing contributor to emissions. Road transport is by far the biggest source of emissions from the transport sector.*" That factor is relevant to Government interventions on climate change and meeting Scotland's climate change targets. SEPA believes that the land use planning system has a key role in helping to stem road transport emissions to support climate change targets, and that stabilising road traffic growth should sit alongside measures such as improved accessibility and modal shift.

2.2.7 The previous administration's Sustainable Development Strategy (2005) *Choosing our Future* recognised that "*historically economic growth has been accompanied by traffic growth*". It signalled both the "*need to break that link*" and the then Scottish Executive's "*aspiration to stabilise road traffic levels at 2001 levels by 2021*" ([paragraph 4.5 refers](#)).

² to contribute to a wealthier and fairer Scotland by supporting sustainable economic growth and improved competitiveness and connectivity;
to promote a greener Scotland by contributing to the achievement of climate change targets and protecting and enhancing the quality of the natural and built environments;
to help build safer, stronger and healthier communities, by promoting improved opportunities and a better quality of life; and
to contribute to a smarter Scotland by supporting the development of the knowledge economy.

³ NPF2 refers to improved accessibility and modal shift in this context meaning, for people, a shift from car-based travel to walking, cycling and public transport; and for goods, a shift from road to rail and water.

The latter does not explicitly translate across to NPF2. Given the significant contribution that transport (excluding aviation) makes to emissions in Scotland, the lack of any commitment in NPF2 to stabilise road traffic levels as part of the “wealthier and fairer” strategic objective and *improved connectivity* aim of the spatial development strategy could undermine the ‘greener Scotland’ strategic objective and *climate change* development strategy aim.

2.3 Has the correct balance been struck between economic development and environmental protection?

2.3.1 Part One of the recently published [Scottish Planning Policy](#) sets out the Scottish Government's view of the purpose of planning and core principles for the system's operation. It makes it absolutely clear that “*planning is about where development should happen, where it should not and how it interacts with its surroundings. This requires promoting and facilitating development, while protecting and enhancing the natural and built environment in which we live, work and spend our leisure time. Careful attention to layout, design and construction should result in places where people want to be.*” (paragraph 4 refers).

2.3.2 It also states that “*Planning has a critical balancing role to play when competing interests emerge in the consideration of future development. It is essential to recognise that planning issues, by their very nature, will often bring differing interests into opposition and disagreement and the resolution of those issues one way or another will inevitably disappoint some parties. Planning cannot be expected to satisfy all interests all of the time. It should, however, enable speedy decision making in ways which are transparent and demonstrably fair*” (paragraph 7 refers).

2.3.3 SEPA acknowledges that, aside from the issue of stabilising road traffic growth, NPF2 has probably gone as far as it can do in terms of promoting a balanced *spatial* development strategy and, as a consequence of the Strategic Environmental Assessment process, the Framework now suitably addresses mitigation of adverse environmental effects as far as practicable at this stage. Much of the precise detail as to actual delivery of the spatial development strategy, in particular national developments and other infrastructure priorities, will fall to the NPF2 Action Programme and new generation development plans.

2.3.4 In a [SEPA news release dated 28 October 2008 on the subject of planning reform](#), SEPA's Chairman emphasised that: “*SEPA will be working, as part of the reformed planning system, with other agencies, local authorities and businesses to enable good development that will allow our economy to grow.*” SEPA's Chief Executive added: “*This change in approach does not mean that SEPA will support development which comes at an unacceptable cost to the environment.*”

2.3.5 SEPA believes that in a forward-looking, visionary and ambitious planning system, economic development and environmental protection (and indeed enhancement) need not be competing objectives. The Agency looks forward to working collaboratively with Government and other partners to enable delivery of all proposed national developments and spatial development priorities in the right location and with appropriate mitigation of environmental effects.

2.3.6 Indeed, where the Agency has a significant role to play, SEPA will assign a senior coordination manager to a proposed national development, to provide oversight and direction. This will also ensure there are no bottlenecks within the Agency which could otherwise cause delays relative to consultation responses, advice, or deliberations on requirements for licensing.

2.4 Do the proposals listed as potential national developments meet the criteria set out by Ministers in a statement to Parliament on 13 September 2007?

2.4.1 SEPA considers that all of the proposed national developments qualify insofar as they each satisfy *at least one* of the criteria set out in the Parliamentary statement. That is not to say that SEPA entirely agrees with how the proposed national developments have been scored against the Government's five strategic objectives and the related spatial development strategy aims.

2.4.2 For example, the proposed public transport improvements in surface transport access which form part of the "Strategic Airport Enhancements" national development might indeed *contribute* to reducing road transport emissions. However, it is perhaps less accurate to suggest that, as an entire package, these strategic airport enhancements will help meet climate change targets⁴. Reduced road transport emissions in and around the airports are unlikely to offset aviation emissions.

2.4.3 As NPF2 makes clear, Scotland will need to plan for a new generation of power stations to provide baseload electricity. The combined pressures of energy security and the need to reduce greenhouse gas emissions in light of climate change will require that these stations are built with the best technology available and the lowest carbon footprint possible. For new coal fired power stations this would require technology with a high thermal efficiency such as gasification and super critical boilers, with the potential to combine this with carbon capture and storage CCS. Unmitigated and unabated coal burning cannot be part of a long term energy policy which is sustainable and therefore we may need CCS as a bridging technology that has the potential to contribute to CO₂ mitigation in the short to medium term and thus help gain time for the application of other, sustainable mitigation technologies. It is essential that Scotland does not build a new power station that commits the country to a plant with a poor energy to greenhouse gas ratio, or to a plant that may not capture its carbon for 15 years or more. It is therefore important to ensure that any new plant built in Scotland is not permitted to operate without carbon abatement into the future. Air pollution impacts (resulting from capture technologies) may include the potential for increased emissions of ammonia, oxides of nitrogen, particulate matter, and non-methane volatile organic compounds (NMVOCs). In particular, the potential for higher ammonia and particulate matter emissions from post combustion capture technologies may make it more difficult to meet other air quality targets. There are also potential impacts in relation to releases to the water environment and issues of waste management, for example disposal of post-use amines.

2.4.4 SEPA notes that only one (Hunterston) of the twelve proposed national developments supports the delivery of waste management targets despite the fact that such targets are recognised throughout NPF2 as a key Government objective.

2.5 Comments regarding the key priorities for regional development set out in the spatial perspectives section

2.5.1 SEPA particularly welcomes the priority that is afforded to:

- i. regeneration, economic development and environmental improvement within i) the Clyde Gateway, especially the Metropolitan Glasgow Strategic Drainage Plan; and ii) the Clyde Waterfront, including delivery of the flood management strategy ([paragraphs 190-196 refer](#));
- ii. strengthened Central Belt connectivity with Edinburgh and Glasgow linked by a fast, efficient, high quality transport system that is well connected to surrounding regions and

⁴ NPF2 indirectly implies this within the Annex: National Developments - Statements of Need

international world markets (paragraph 185 refers). Electrification of the rail line between Glasgow and Edinburgh, the opening of the Airdrie - Bathgate line, and new airport rail links will make important contributions to strengthening Central Belt connectivity, but at the same time, it would be desirable to see a parallel Government commitment to stabilise road traffic growth;

- iii. co-ordination of The Glasgow and Clyde Valley Green Network Partnership, The Central Scotland Forest and the Forth and Clyde and Union Canals renewal initiatives to create a Central Scotland Green Network and strategic improvements in environmental quality (paragraph 200 refers);
- iv. the crucial role of the Highlands and Islands in delivering renewable energy (paragraph 213 refers);
- v. with regard to the south of Scotland, the opportunities to develop business excellence in Magnox reactor decommissioning brought about by the recent closure of the nuclear power station at Chapelcross near Annan (paragraph 235 refers);
- vi. in relation to the East Coast, i) the need to grow and diversify the economy of Aberdeen and Aberdeenshire, making sure the region has enough people, homes, jobs and facilities to maintain and improve its quality of life (paragraph 202 refers); ii) the potential conversion to clean-burning which could extend the life of Peterhead power station and offer future opportunities for carbon capture plus the development of a local heat network (paragraph 207 refers); and iii) the potential for sustainable waste management in Peterhead as a result of the deep water harbour. That said, it is unclear why Peterhead power station is singled out for its local heat network potential, and likewise why Peterhead is singled out for sustainable waste management potential given the pressing need throughout Scotland to promote sustainable waste management. SEPA welcomes the much broader emphasis that paragraph 166 of NPF2 places on the need for all planning authorities to “...*facilitate the provision of a network of waste management installations which enable the movement of waste to be minimised and EU and national targets to be met, taking account of opportunities to derive energy from waste and develop local heat networks.*”