



National Planning Framework 4

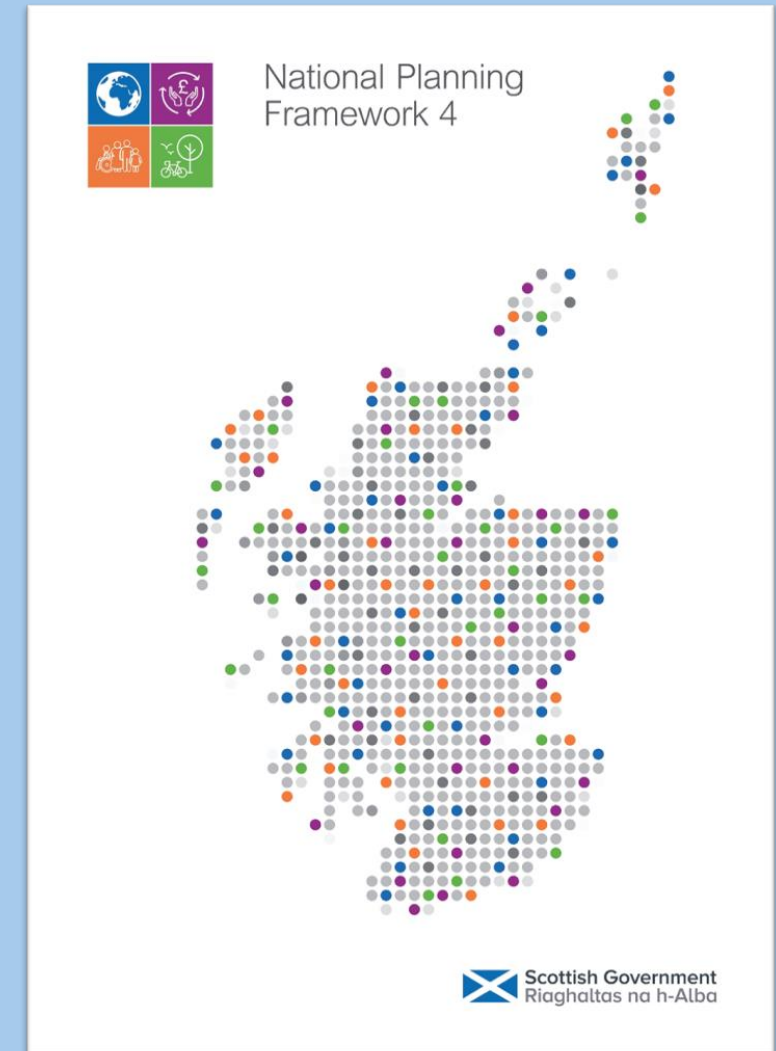
Planning and climate change guidance

EIA Conference October 2024

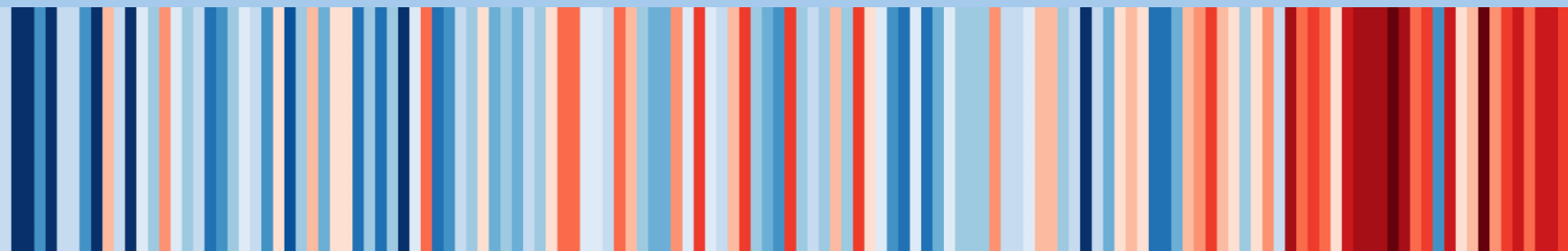
Charles Nathan – Senior Planner
Planning, Architecture and Regeneration Division

A national spatial strategy for Scotland to 2045

33 national planning policies that ‘apply as a whole’...



Temperature change in Scotland since 1884 [#ShowYourStripes www.showyourstripes.info](https://www.showyourstripes.info)



Project

Goal: NPF4 Delivery Programme - Prepare guidance on planning and climate change

Focus: Support implementation of *NPF4 'Policy 2 – climate mitigation and adaptation.'*

Objective: to outline the type of information useful for decision-making, and how to identify and produce it, to demonstrate that a development proposals':

- lifecycle greenhouse gas emissions (GHGs) have been '*minimised as far as possible*' and
- '*sited and designed to adapt...*'

Policy Principles

Policy Intent:

To encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change.

Policy Outcomes:

- Emissions from development are minimised; and
- Our places are more resilient to climate change impacts.

- a) Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.
- b) Development proposals will be sited and designed to adapt to current and future risks from climate change.
- c) Development proposals to retrofit measures to existing developments that reduce emissions or support adaptation to climate change will be supported.

Progress

- Expert Advisory Group up and running.
- SG commissioned research on mitigation and lifecycle greenhouse gas emissions assessment, published 9th July.
- Draft guidance in prep.

Context

Context	Guidance response
Mitigation and adaptation, distinct but cross-cutting	Help identify and consider the ‘win-wins’
NPF4 policy 2 applies to all development	Need for proportionality Applicable to a wide set of development types and scales
Awareness, skills and experience amongst stakeholders varies	Must be simple, accessible and credible
Existing established standards and guidance	No need to replicate Can focus on providing clarity on climate and proportionality

Taking a proportionate approach

Development	Lifecycle GHG Assessment
National & Major development	<ul style="list-style-type: none">• Potential for large scale emissions/ cost reductions• Clear benefits of using industry tools and standards for quantifying and managing carbon
Local development and proposals that have less detail, such as PPP applications	<ul style="list-style-type: none">• Small scale proposals and small-scale emissions reductions• Quantified data on emissions may not lead to a better-informed decision• High-level qualitative approach to managing carbon could be sufficient

Next Steps

- Complete draft guidance
- Road test content of the guidance/ source feedback from stakeholders
- Progress to final publication....



Carbon Management: Beyond EIA compliance

Lewis Barlow

ICE Trustee for Carbon and Climate

WSP Head of Profession: Decarbonisation



Carbon and the Planning Process



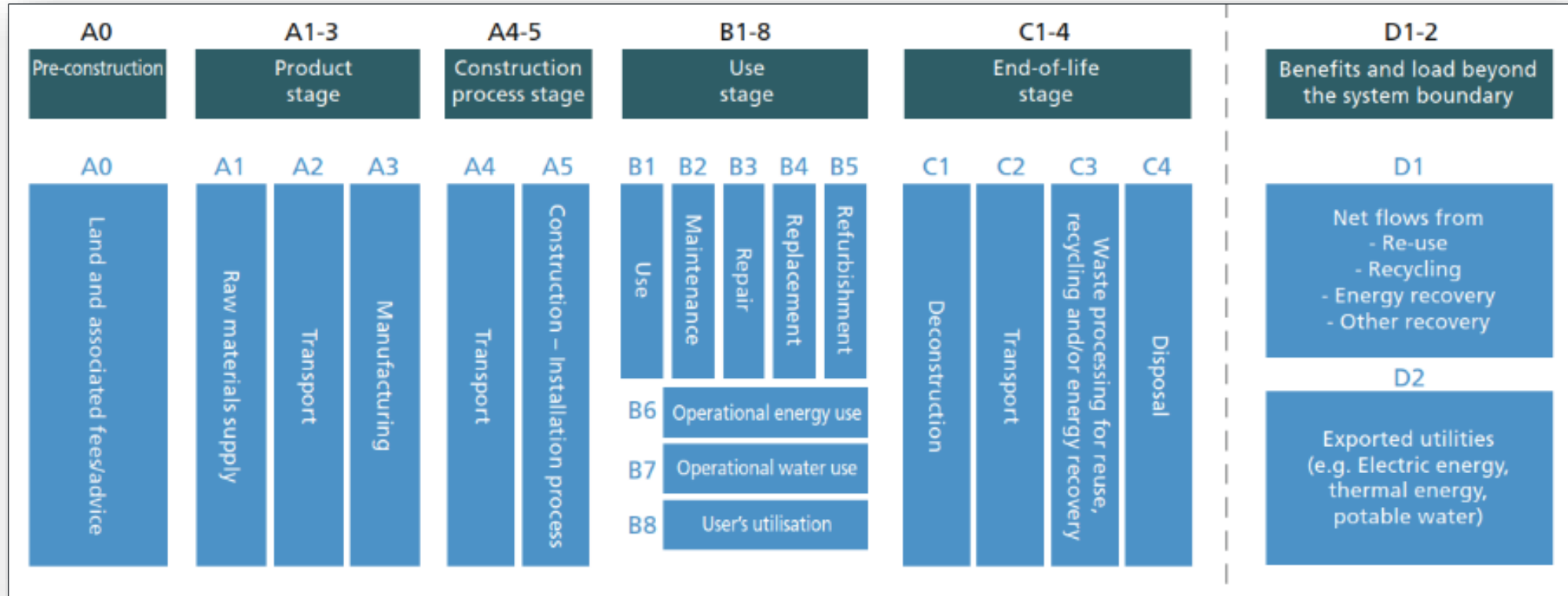
Plan B / FoE Vs UK Government



Finch Vs Surrey County Council

Theme: Whole Life Carbon impact must be considered

Whole Life Carbon



From BS EN 17472:2022 - Sustainability of construction works. Sustainability assessment of civil engineering works. Calculation methods

Whole life carbon emissions impact is the **overall change in carbon emissions over time**

National Planning Framework 4

A long-term plan looking to 2045 that will guide spatial development, set out national planning policies, designate national development and highlight regional spatial priorities

Policy 2a) “Development proposals will be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible”

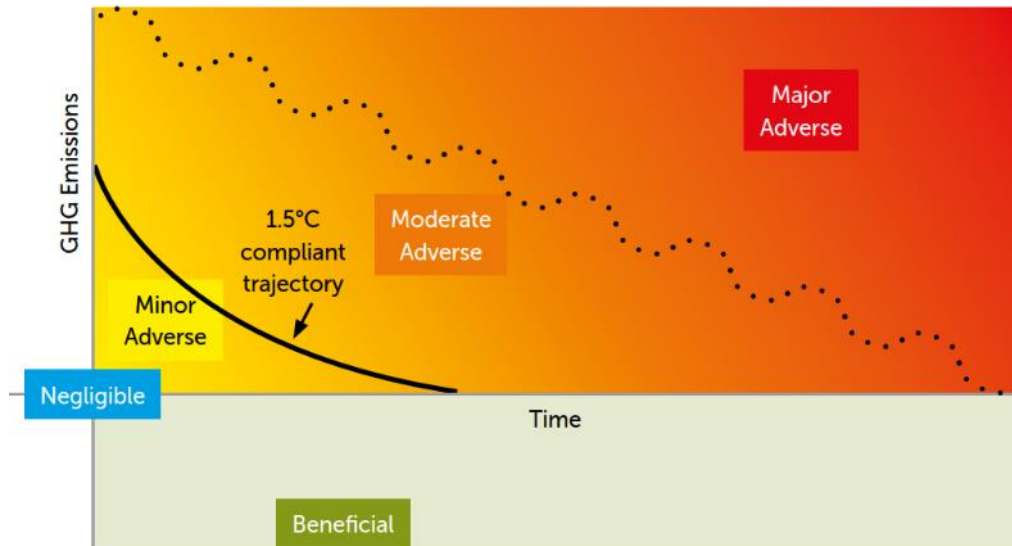
Lifecycle greenhouse gas emissions = Whole Life Carbon

NPF4 seeks to ensure that Whole Life Carbon is considered through the planning process



EIA Carbon Guidance - IEMA

Assessing GHG Emissions and Evaluating their Significance



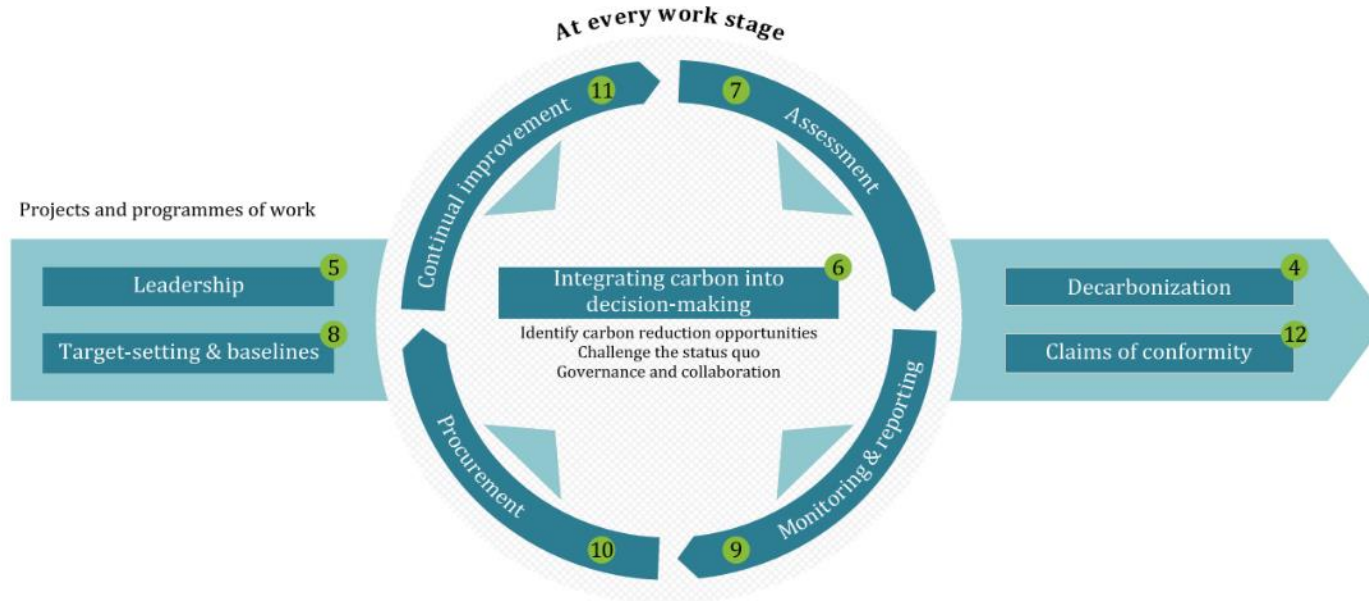
The crux of significance therefore is not whether a project emits GHG emissions, nor even the magnitude of GHG emissions alone, but whether it contributes to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050³³.

A project that is compatible with the budgeted, science-based 1.5°C trajectory (in terms of rate of emissions reduction) and which complies with up-to-date policy and 'good practice' reduction measures to achieve that has a **minor adverse** effect that is **not significant**. It may have residual emissions but is doing enough to align with and contribute to the relevant transition scenario, keeping the UK on track towards net zero by 2050 with at least a 78% reduction by 2035³⁷ and thereby potentially avoiding significant adverse effects.

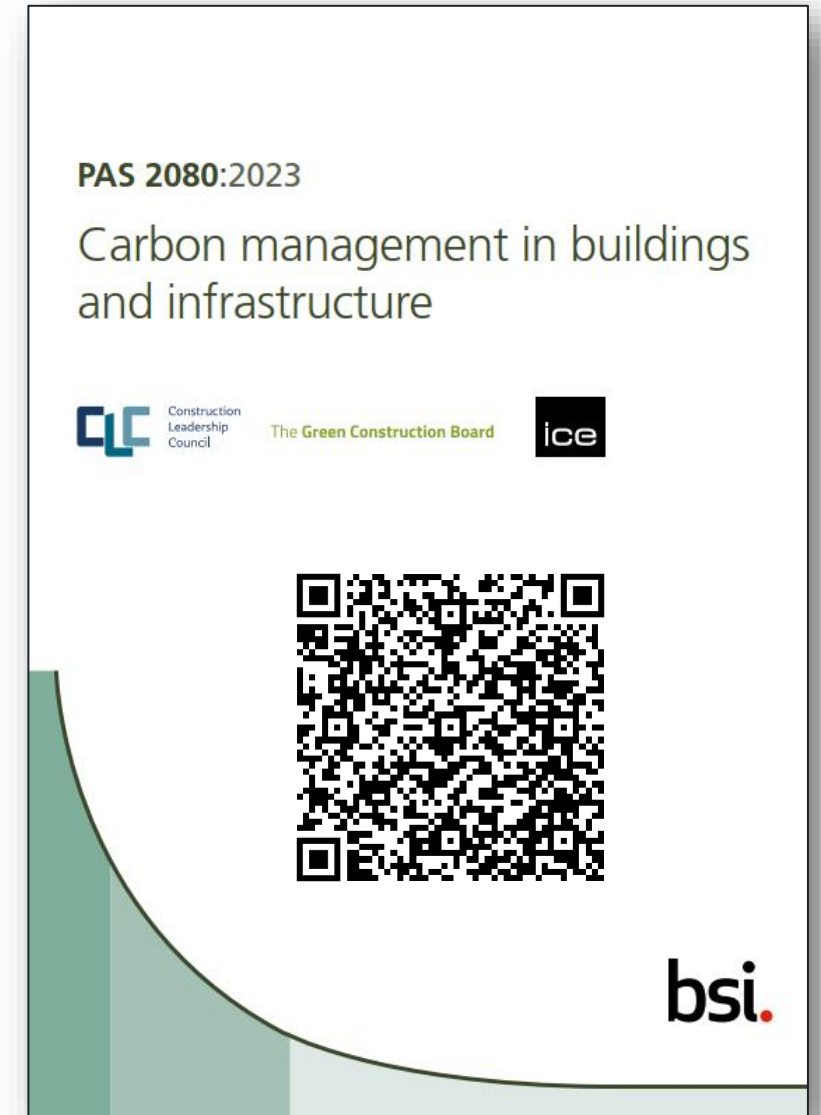


PAS 2080:2023

Carbon Management in Buildings and Infrastructure



PAS 2080 promotes reduced carbon, increased value delivery, more collaborative ways of working, and a culture of challenging convention and traditional practice for decarbonisation



National Planning Framework 4

Research for Climate Change Guidance – July 2024

Whole Life Carbon Assessment

- Importance of assessing whole life carbon emissions at the earliest stages of planning to align with net zero policy

Existing Standards, Regulations and Thresholds

- Significance of standards like EIA, Net Zero Public Sector Building Standard, and Scottish City Region and Growth Deals

Emerging Approaches and Standards

- Such as 'Part Z', Net Zero Carbon Building Standard, and Climate Emergency Response Group's Net Zero Test

International Approaches

- Insights from other jurisdictions like Sweden, Ireland, New Zealand, and Greater London Authority on embedding carbon in planning processes

Stakeholder Engagement

- Feedback from stakeholders highlighting the need for clear guidance, consistent methodologies, and adequate resourcing



Research to Inform National Planning Framework 4: Planning and Climate Change Guidance

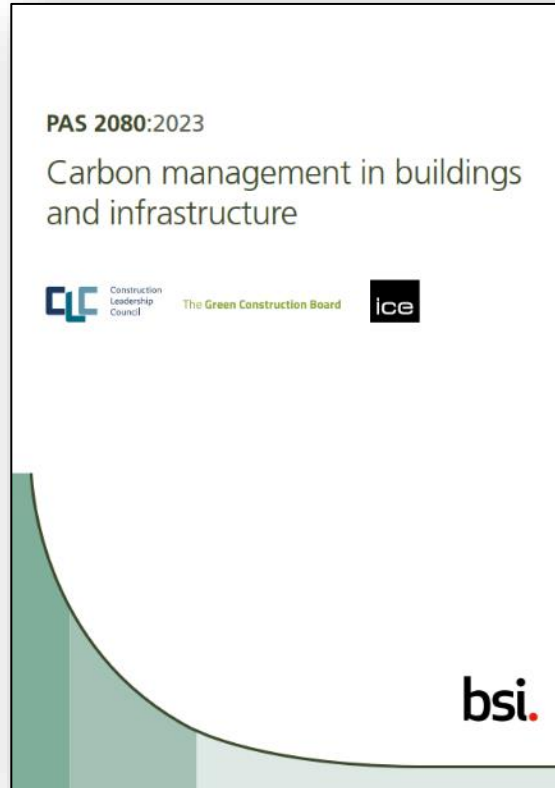
Report Issue 3

Report commissioned by the Scottish Government

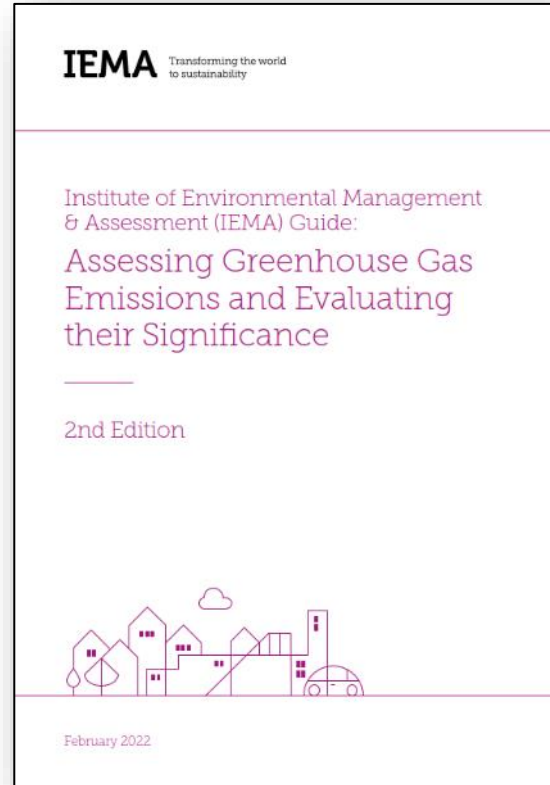
July 2024

 Scottish Government
Riaghaltas na h-Alba

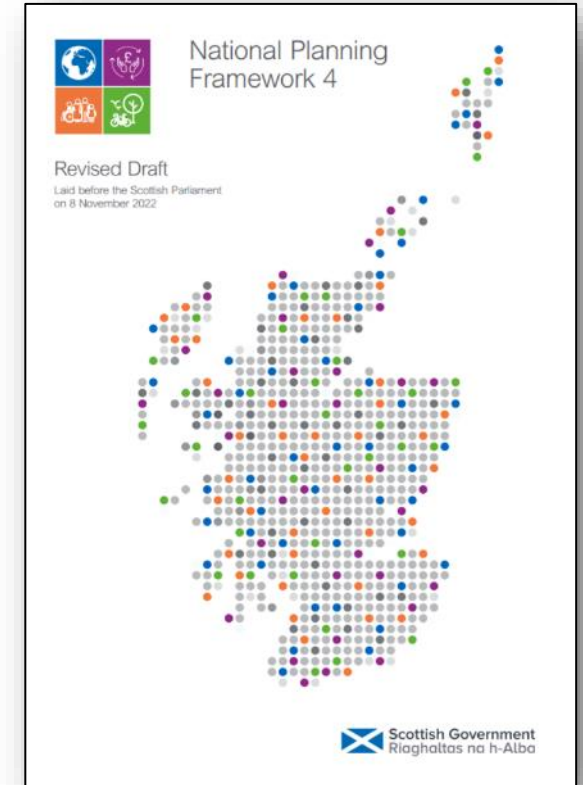
Net Zero Recipe



+



+



Scotland's EIA Conference 2024

Greenhouse Gas Emissions and EIA



Prepared by LUC

Joanna Wright MA MSc FIEMA CEnv

3rd October 2024

Coverage of the presentation

Existing guidance on addressing GHGs in EIA

Reflections from current practice (including the 'Finch Case')

Where next?



Current requirements

Schedule 4, paragraph 5 of the EIA Regulations requires:

"A description of the likely significant effects of the development on the environment resulting from, inter alia:....

(f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change"



Current guidance

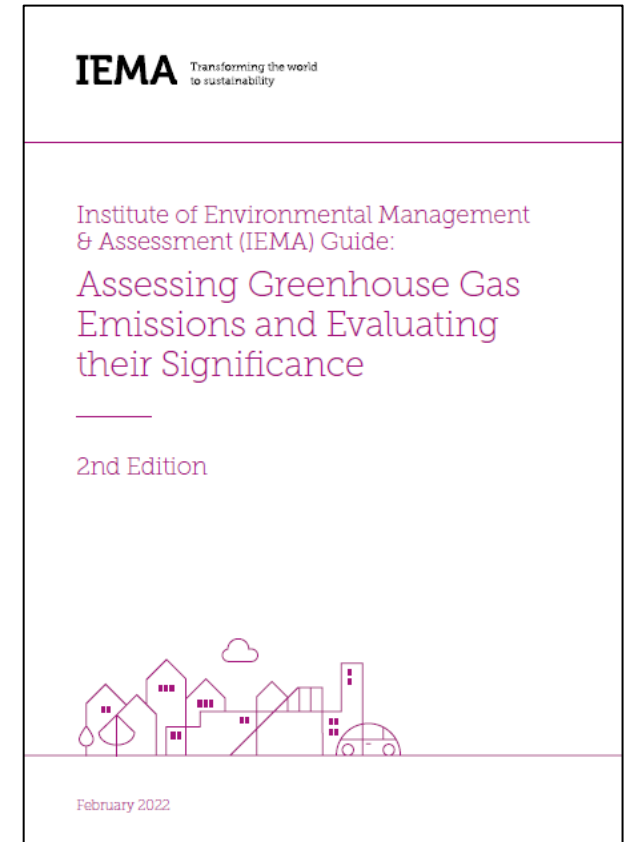
All projects contribute to climate change – largest **inter-related cumulative** effect

GHG emissions should **always** be considered and reported but at **varying degrees of detail** depending on the project

Focus on **proportionate assessment** to avoid undue burden

A **life cycle type approach** should be adopted, considering pre-construction, construction, operation, decommissioning

Mitigation ideally should be **embedded** through the project life (generally earlier is better)



Using the guidance: test of significance

*“The crux of significance is not whether a project emits GHG emissions, nor even the magnitude of GHG emissions alone, but whether it contributes to **reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050**”*

1. A project that follows a ‘**business-as-usual**’ or ‘**do minimum**’ approach which is not compatible with the UK’s net zero trajectory results in a **significant adverse** effect.
2. A project that is **compatible with the trajectory** results in a **minor adverse** effect that is not significant.
3. A project that goes **substantially beyond** the reduction trajectory has a **negligible** effect that is not significant.
4. A project that causes GHG emissions to be **avoided or removed** from the atmosphere has a **beneficial** effect that is **significant**.

Thoughts on current practice

The number crunching....

Assumptions about 'embedded' mitigation

Over reliance on national carbon budgets – 'less than 1%'

Emerging case law:

EWHC 1221 (Admin) (23 May 2022): cumulative effects of GHG in combination with other projects

EWHC 171 (Admin) (31 January 2023): failure to deal with non-CO2 emissions

R (Finch) v Surrey CC and Others (2024) UKSC 20: consideration of downstream (indirect) effects

Where next?

Need to improve on **inconsistency** in practice

Need to get better at:

- **quantifying emissions**
- determining **compatibility with net zero** trajectories

Divergence from **Environmental Outcome Reporting?**



Thank you!

Joanna Wright

Director of Environmental Planning, LUC

joanna.wright@landuse.co.uk



landuse.co.uk