

## Scotland 2045 – Our Fourth National Planning Framework:

### Resource Management Association Scotland (RMAS) Consultation Response

#### Summary Comments

The RMAS welcomes the ‘whole view’ that NPF4 takes for Scotland to give joined up policy direction to the planning system. The aims of Net carbon Zero, Zero Waste, Health and Well Being, Liveable places, Productive places, Just Transition and the Zoning approach is helpful and strongly supported.

We also support the obvious point that policies should work together, and those developments need to be considered in terms of how they interlink. That said the devil is in the detail and we are concerned that these clear objectives will fail to be delivered by the local planning system which is frequently more parochial and influenced by local politics. The RMAS believes NPF4 needs more detail in terms of delivery and joining up policy with action, to deliver improved resource management infrastructures and outcomes.

The local planning system frequently fails to demonstrate a detailed understanding of the issues relevant to good determination outcomes, including system carbon, the interaction between local decisions and the development of integrated networks at a national level. There are also little if any legislative teeth in this document and it will require clear direction and other drivers and supportive elements to deliver the right developments in the right place.

The RMAS considers the NPF4 needs to be supported not only with legislation but also with targeted capital support to better direct integrated infrastructure, not leaving this to the vagaries of the free market for developments which are critical to the economy of Scotland and a key component of a just carbon transition.

NPF4 and related Scottish Planning Policy is fundamental to achieving the 2045 Net Zero target. Whilst there is much in the NPF4 that is worth supporting, as noted above, the RMAS considers NPF4, whilst comprehensive in structure lacks the radical focus to assist the current planning system in achieving the level of changes required at the pace of transition necessary. Post COP 26 and the global reality check this presented, we do not feel that NPF translates that urgency into the necessary tools to ensure the planning system delivers on its key roles.

It will be a huge achievement to develop an economy which produces no waste and fully exploits materials, methods of manufacturing and consumption habits which deliver zero waste. This transformation will take time and will require cross sectoral collaboration.



We must ensure that the investments, developments, and technologies we deploy can cope with existing and future demand and are future proofed in terms of ability to adapt and change. We need to ensure that there is sufficient capacity to cope with our own general and specialist waste and resource sorting, reprocessing and disposal needs while building a national and local infrastructure which delivers economic advancement and Net Zero by 2045.

We have not addressed the document in its entirety but have focused on resource related issues and other areas of connected concern such as renewable energy.

### *Summary Recommendations*

1. **Carbon expertise:** The RMAS would like Scottish Government to consider the establishment of a cross skilled carbon assessment group (carbon specialists from agriculture, manufacturing, land use, transport and resource management whose specialist knowledge can be used to support local planning authorities assess carbon impacts in a consistent way).
2. **Skills:** The RMAS considers a specific training programme is put in place to ensure each local authority planning department has at least one planner skilled in considering resource management applications.
3. **Integrated Infrastructure Networks:** The RMAS believes it is time for a National Strategic Resource and Waste Planning Authority, to deliver what aggregates to nationally critical infrastructures, in an integrated manner.

## Resource Management

**Policy 20:** *Zero waste. 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?*

We welcome the breadth of intent of NPF4 in respect of zero waste and the circular economy.

The resource management sector fully supports this section. We welcome the proposal that close coupled manufacturing with recycling facilities should be encouraged, the requirement on developers for functional heat networks for Energy from Waste (EfW) facilities, and for EfW facilities to provide a decarbonisation strategy aligned with Scottish Government decarbonisation goals.



### *Recommendations*

We offer the following recommendations for this section.

1. The RMAS believes more could be made of the fact that the resource and waste sector can provide many materials and products which support the other desired outcomes. Recycled aggregates and soil conditioners can help clean up contaminated land and improve land value. Recycled plastic content can provide walkways, fencing and other products to help with access to land improvements or even flood defences. The outputs of our sector can be the inputs of others. We would like to see these opportunities more clearly highlighted.
2. The challenge remains delivery. Although many of the ambitions and links to the climate emergency and biodiversity crisis are to be welcomed, there is a lack of detail on implementation, enforcement, and the legal weight behind these outline proposals to enable transformational change to be delivered. For example, the requirements for heat networks and de-carbonisation plans need to be applied uniformly across the current and future fleet of facilities.
3. The plan is heavily caveated with the use of “should”. The RMAS would like to identify further specific instruments that will help deliver the objectives set out in NPF4 and we look forward to working with Scottish Government in the development of the detailed delivery programme and related supportive measures.
4. Given the range of resource management objectives for development proposals within the categories of national and major developments we believe these should be contained in a Construction (or Demolition) Resource Management Plan. This would support a consistent approach that fully engages developers with the resource management sector.

## **National Developments**

The RMAS welcomes Circular Economy Materials Management facilities being identified in the category of National Developments. This will support a network of new materials management facilities.

The challenge remains as to how to deliver an integrated network of facilities at the right scale in appropriate locations. The RMAS would welcome engagement with Scottish Government on how to deliver this.

### *Recommendations*

The RMAS request that the Scottish Government engages with the RMAS to identify and evaluate policy and other options to support development of an integrated network of Circular Economy Materials Management Facilities in Scotland.





RESOURCE MANAGEMENT ASSOCIATION SCOTLAND

## Green Energy

**Policy 19: Green energy** 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?

Liveable, Productive and Distinctive' places should each acknowledge the need for distributed renewable energy generation and technologies to be accepted as part of the human and natural environment. This is essential to support the growth of community renewable energy schemes and the types of renewable energy private grids our members might wish to develop to help decarbonise their business operations. The mitigation of climate change from renewable energy developments should be given much stronger support in NPF4 and local authority planning departments need clearer guidance to support renewable energy developments in all these sections. Policies to support this transition should reflect the UK Climate Change Committee for deployment of renewable technologies to meet the 2045 target.

Given the lowest cost and easiest to deploy renewable energy systems are wind and solar, these should be strongly directed for local energy projects and for private grid developments to decarbonise business. The resource management sector is already demonstrating some of this potential to utilise private grid renewable power in some of our member businesses.

### *Recommendations*

The RMAS requests that renewable energy developments connected to industrial users to decarbonise industry are specifically designated within NPF4. We would be happy to discuss and exemplify the principle with specific example connected renewable energy developments within our own sector.



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