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## **General comments: A low carbon place**

WWF Scotland welcomes the broad ambition contained within the NPF3 to create a 'low carbon place', with specific focus on low carbon energy generation, an energy and resource efficient built environment and transport networks that are largely decarbonised. These are all necessary requirements if we are to deliver emissions reductions under Scotland's 2009 Climate Change Act.

We are pleased to see the link being made between the NPF3 and the Report on Proposals and Policies 2 (RPP2). The NPF3 repeats some of the commitments within the RPP2, but we believe it can give a much stronger and consistent steer on the strategic importance of the low carbon agenda, and the steps that need to be taken in order to meet our climate change targets. WWF Scotland is also concerned that, overall, there are stark inconsistencies between the vision of securing a low carbon place and the aspects of the NPF relating to increased oil and gas extraction, unconventional gas extraction, and increased airport capacity.

## **Key recommendations:**

- 1) Adopt the recommendations set out in the Expert Commission on District Heating response.
- 2) Provide strategic spatial guidance to ensure waste heat can always be used from industrial and power generation sites.
- 3) Ensure there is a full consultation on the SNH wild land map and its implications for ensuring Scotland meets its climate targets.
- 4) The NPF3 must not designate new thermal power plants as national developments on the basis of the possible future role of CCS, a technology not proven at a commercial scale.
- 5) WWF Scotland does not believe that the Scottish Government's overall transport policy is aligned with its climate change agenda and the final NPF3 should give clear national development status to improved cycling infrastructure and rail connectivity.

## **Q1. Decarbonisation of the heat sector:**

WWF Scotland is a member of the Expert Commission on District Heating and fully supports the consultation response and recommendations made by the Commission. In particular we think that NPF3 should provide direction to local authority planners to designate areas of encouragement for district heating to help establish a market; in these areas district heating would be actively presumed to be the default requirement in planning applications for new developments and refurbishments.



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In addition to establishing designated areas for district heating then NPF3 should require the connection of public sector buildings offering significant 'anchor loads' to district heating networks. In this way new public sector buildings should be the trigger for new networks.

Thirdly we highlight the importance of the use of waste heat and the need to ensure this is a feature of few industrial or power sector developments. Too often in the past the proposed locations for new developments, such as a Cockenzie gas plant, have undermined the economic case for waste heat use. The NPF3 should ensure that is not the case in the future by requiring the use of waste heat and thereby providing strategic guidance as to regards appropriate locations for development. The use of waste heat must not be a secondary consideration but an a prior criteria in determining suitable sites where waste heat will be generated.

In a cautious projection of district heating provision, the UK CCC projected approximately 10% district heating in 10 UK cities by 2020. Analysis for WWF concluded that under a scenario of 50% renewable heat provision for the domestic sector by 2030, approximately 350,000 Scottish dwellings must be connected to a district heating system.

## **Q2 Onshore wind**

We agree that the NPF3 should identify and safeguard areas where there remains the greatest potential for further large scale wind energy development.

WWF Scotland agrees that landscape is a legitimate consideration in the siting and consenting of wind farms. However, we are concerned that the SNH 'updated' wild land map and the potential implications it poses to Scotland's ability to meet our climate targets has not been subject to consultation prior to its proposed inclusion in the NPF.

## **Q3 Offshore renewable energy**

WWF Scotland agrees that NPF3 should include the priorities listed under 2.26 relating to the identification and support for infrastructure required to help develop offshore renewable energy. This includes the identification of onshore infrastructure requirements needed to assist the early delivery of key offshore renewable energy projects.

## **Q4 Base load electricity generation requirements.**

Analysis by Garrad Hassan, commissioned by WWF Scotland and others, concludes that renewables could comfortably provide 100% of Scotland's annual electricity demand by 2020, increasing up to 185% by 2030, without resorting to new nuclear or endangering environmental interests, and allowing for electrification of both heat and transport sectors. Scotland could phase out all conventional thermal generation capacity by 2030 and still deliver a secure and reliable electricity supply.

We are pleased to see the repeated commitment to largely decarbonised electricity generation by 2030 and the removal of the proposal for new unabated coal at Humberston from the NPF. However, both the final RPP2 and the recently published Electricity Generation Policy Statement rest on an assumption that CCS will be shown to be economically and technically viable by the early 2020s. This assumption significantly undermines the credibility of the RPP and the Scottish Government's commitment to 50gCO<sub>2</sub>/KWh grid carbon intensity by 2030.

WWF Scotland supports the testing of CCS on existing gas power stations and therefore supports the inclusion of Peterhead CCS as a national development.

If the Captain project is to secure national development status it must be made clear in the designation that this should mean it is fully covered by CCS from day one of operation and should only be allowed to run if it achieves at least 90% carbon capture. In addition the development should not include enhanced oil recovery.

The proposed continued designation of Longannet and Cockenzie as described in the draft NPF3 is not consistent with meeting our climate targets, or achieving a decarbonised power by 2030. Designating thermal power generation as national developments, in the hope that CCS becomes economically viable by 2030, is a long way from offering a robust low carbon energy strategy. The RPP2 requires that 1.6GW of thermal power are fitted with CCS by 2027 this is a different description to that provided by NPF3. Neither Longannet nor Cockenzie should be given national development status unless they are required to be *fully* fitted with CCS from the point of operation, not as the draft proposes to have an un-quantified volume of CCS fitted by 2030.

#### **Q5. Electricity transmission, distribution and storage.**

WWF Scotland supports the inclusion of electricity grid reinforcements as national developments, including the onshore infrastructure requirements associated with increase interconnection to England, Ireland and Norway.

The draft NPF3 is right to highlight the importance of storage. The economic case for storage will become stronger and stronger as more renewable energy comes on to the grid. The NPF3 should aim to provide strategic guidance regarding the importance of storage and its likely spatial needs.

#### **Q11 Economic growth and sustainable development**

WWF Scotland has concerns about the intention of the NPF3 to promote 'sustainable economic growth', an ill-defined term in both the legal and planning environment. As such, it has become analogous with standard economic growth as measured by GDP, and relegates the important social and environmental factors that are essential to securing a flourishing Scotland.

The use of the term 'sustainable economic growth' vastly outnumbers the use of the term 'sustainable development' within the NPF3. WWF Scotland strongly urges the Scottish Government to give clear priority to the use of the term 'sustainable development', which seeks to integrate the environment, economic and social in the context of environmental limits.

#### **Q13 Homes**

As recommended by the Scottish Parliament's Local Government and Regeneration committee in its draft RPP2 report, the NPF3 could contain 'specific requirements on favouring lower carbon emission options, to aid the transition to a low carbon economy and low carbon lifestyles'.

WWF is therefore concerned to see no mention of energy efficiency in new build housing within this section. The NPF3 raises the issue of the need for a significant increase in house building rates but fails to use the opportunity to make the link between housing and emissions reduction. The failure of the NPF3 to acknowledge the need for robust energy efficiency standards for new housing compounds the Government's intention to weaken proposed building standards for 2014 as recommended by the Sullivan Report.

#### **Q14 Transport**

WWF Scotland does not believe that the Government's overall transport policy is aligned with its climate change agenda. The RPP2 contains a clear aim to largely decarbonise the transport sector by 2050. However, it fails to set out a credible range of measures to achieve this, including demand management measures to reverse the growth of road transport and reduce reliance on the private car. The Carbon Account for Transport estimates an annual growth in emissions from transport, driven by a net increase in vehicle kilometres as a result of Transport Scotland interventions.

We welcome the recognition that it is important for the NPF3 to contribute to reducing the need to travel, but the signals need to be much stronger, and more consistent with other Government policy. Both the Infrastructure and Investment Plan and the Strategic Transport Projects Review identify road infrastructure as a priority for significant investment, contradicting the messaging in the NPF3.

The final NPF3 could provide much greater clarity on the national need for improved cycle infrastructure in urban environments. For instance, the NPF3 could identify suitable cycle corridors that would support increased commuting and travel to school by bike.

The NPF3 should describe the duelling of the Perth to Inverness railway line as a national priority. The current single track line with limited passing places does not allow the rail line to compete with the road network and offers a poorer alternative for freight movement. If journey times are to be significantly reduced then duelling the line is necessary.

#### **Q16 Aviation**

Emissions from aviation and shipping are included in the Climate Change Act, so any expansion of capacity in these sectors must not be allowed to undermine the delivery of this important legislation. WWF Scotland therefore does not support the inclusion of national developments that will result in an increase in the number of flights from Scotland's priority airports.