Biofuelwatch response to Draft National Planning Framework 4 Consultation

31st March 2022 - Biofuelwatch is a non-profit organisation undertaking research, campaigning and policy advocacy in relation to the impacts of large-scale bioenergy.

Questions - Part 1 – A National Spatial Strategy for Scotland 2045

1 Sustainable places

Our future net zero places will be more resilient to the impacts of climate change and support recovery of our natural environment. Do you agree that this approach will deliver our future net zero places which will be more resilient to the impacts of climate change and support recovery of our natural environment?

Biofuelwatch believes that the National Planning Framework 4 can play a key role in tackling the climate emergency and biodiversity loss. As the strategic spatial vision for the next decade, NPF4 has the potential to pave the way forward for reductions in greenhouse gas emissions, genuinely renewable energy, ecosystem restoration and healthy communities with access to clean air and green spaces.

This can only be achieved with transformative changes to the planning system which do not lock in dirty fossil fuel developments or dangerous false solutions like biomass burning.

Biofuelwatch strongly agrees that planning policies must enable Scotland to keep within the 'planet's sustainable limits', reduce carbon emissions and support the recovery of our natural environment. We support the proposals to encourage energy efficiency, ' secure positive effects for biodiversity' and 'diversify and expand renewable energy generation'.

We are, however, concerned that these ambitions in part 1 are not always reflected in part 3 of the draft NPF4 and that the policies need to be strengthened to reflect the level of ambition. Developments that contribute to net climate emissions or result in a loss of biodiversity should not be acceptable.

We are also concerned that renewable energy is not defined in NPF4 and that this could potentially lead to planning permission being granted for medium or large-scale biomass plants.

The most recent IPCC report has warned that any delay in climate action means that we will miss a "brief and rapidly closing window of opportunity to secure a liveable and sustainable future for all."

A transformative planning system could help to cut emissions and support the recovery of our natural environment by acknowledging that economic growth of itself is not necessary for well-being and by ensuring the prevention of unsustainable developments such as fossil fuel or biomass plants which will harm communities, wildlife and the climate.

2 Liveable places

Our future places, homes and neighbourhoods will be better, healthier and more vibrant places to live. Do you agree that this approach will deliver our future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live?

Biofuelwatch strongly agrees with the aim of making our future places healthier and more liveable and with the ambition to restore biodiversity.

However, the current draft of the National Planning Framework gives few details of how this could be achieved and more focus is needed on how unsustainable developments and biodiversity loss can be prevented.

A vital means of creating more liveable places is to prioritise the protection and restoration of existing biodiverse ecosystems, including forests, peatlands and green spaces, rather than monoculture tree plantations. This would not only support biodiversity but it would also contribute to the mental and physical health of communities.

Communities should also have the right to challenge unsustainable developments and be given the same rights as developers, including a right to appeal planning decisions.

3. Productive places

Our future places will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing. Do you agree that this approach will deliver our future places which will attract new investment, build business confidence, stimulate entrepreneurship and facilitate future ways of working – improving economic, social and environmental wellbeing?

Biofuelwatch welcomes the focus on a transition to a just and nature-positive economy. However, we are concerned that the productive places approach set out in the draft planning framework risks undermining improved social and environmental wellbeing through the continued focus on attracting investment and entrepreneurship and the lack of detail about what is meant by 'green investment.'

We believe the climate and nature emergencies must be at the heart of NPF4 if we are to meet Scotland's crucial 2030 and 2045 climate targets and planning presumption should only be encouraged for developments which do not harm biodiversity or the climate.

The draft document gives little detail about how the transition to a 'nature positive' and zero carbon economy could be achieved through planning decisions and does not define what is meant by a Just Transition.

Biofuelwatch fully supports the need for a Just Transition as defined by the Climate Justice Alliance as a 'vision-led, unifying and place-based set of principles, processes, and practices that build economic and political power to shift from an extractive economy to a regenerative economy.'

This would include greater public and community ownership to enable communities to move away from a reliance on fossil fuels or biomass burning. It would also include support for genuinely green jobs in areas such as renewable wind and solar power or climate-friendly sectors such as health, social care and education.

4 Distinctive places
Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient.Do you agree that this approach will deliver our future places which will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient?

Biofuelwatch supports the ambition to 'restore the richness of Scotland's natural environment' and 'respond to the biodiversity crisis' but there is a lack of detail within the draft NPF4 of how this could be achieved and how unsustainable developments such as fossil fuel or biomass plants could be prevented.

A key means of ensuring 'nature positive' future places is to support peatland restoration as well as the protection and restoration of existing biodiverse woodlands. The replacement of monoculture conifer plantations with mixed deciduous woodland can also be an important factor in supporting biodiversity.

5 Distinctive places
Our future places will be distinctive, safe and pleasant, easy to move around, welcoming, nature-positive and resource efficient.Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?

In order to deliver places that are sustainable, liveable and distinctive, it is vital for the NPF4 to put greater priority on meeting our climate targets and reversing biodiversity loss.

Equally important is a strong focus on supporting a just and fair transition away from fossil fuels and biomass burning towards green jobs in renewable wind, wave and solar energy together with heat pumps and other infrastructure needed to scale up reliance on truly low carbon renewables.

9. North and west coastal innovation
What are your views on these strategic actions for this action area?

Biofuelwatch supports the focus on peatland restoration and woodland creation and restoration, including Scotland's temperate rainforest.

We are, however, sceptical about the focus on the production of hydrogen which is an unproven technology and carries a high risk of further entrenching fossil fuel burning, given that hydrogen is far cheaper and easier to produce from natural gas than from (renewable) electricity.

Instead, planning decisions should favour genuinely renewable wind, solar and tidal energy which can help to create new green jobs.

11 Northern revitalisation
What are your views on these strategic actions for this action area?

Biofuelwatch supports the proposal to develop more wind energy, solar power and community-scale energy generation to serve the needs of local communities. We believe that community ownership of renewable energy projects should be supported throughout Scotland.

We welcome the focus on woodland expansion and peatland restoration as well as the priority given to reversing biodiversity decline.

However, we are concerned by the lack of definition of the term 'nature-based solutions' in part 7 as this term can be used to greenwash offsetting schemes by polluting corporations.

As Friends of the Earth Scotland highlights, the term 'nature based solutions: 'co-opts and threatens to corrupt many real solutions to the nature and climate emergencies such as agro-ecology and community forest management including by linking them to market based schemes, and using them as offsets. It also enables harmful, false solutions such as monoculture plantations and industrial agriculture to emerge alongside genuinely good practices.'

15 Central urban transformation
What are your views on these strategic actions for this action area?

Biofuelwatch is concerned by the proposal in section 16 to use 'bioenergy hydrogen production with carbon capture and storage' in order to reduce emissions at Grangemouth.

Hydrogen production from biomass syngas would require large-scale biomass gasification or pyrolysis delivering syngas that is cleaner than any syngas that has so far been produced from biomass in the UK. This would involve major technological hurdles and as yet, there has been no successful biomass pyrolysis plant producing syngas in the UK. More detailed information about the technological obstacles in producing hydrogen from biomass syngas can be found here:
https://www.biofuelwatch.org.uk/2022/scottish-hydrogen-consultation-response/

Even if the technological challenges were overcome, we believe that further support for biomass energy in Scotland, regardless of carbon capture, cannot be justified due to the biodiversity, health and climate impacts of burning wood for energy.

Logging for the biomass industry has resulted in forest degradation and biodiversity loss around the world. Any increase in support or demand for bioenergy has significant potential to exacerbate this harm to wildlife and forest ecosystems.

Burning wood biomass has also been associated with a range of serious health problems, including cancers, cardiac and respiratory complaints and asthma attacks. The World Health Organisation notes that there are no safe levels of exposure to particulate emissions for human health. Moreover, scientific studies have shown that burning wood is not carbon neutral as it will take decades or longer for new trees to grow and absorb the emissions produced by logging and transporting trees that are burned today. This is time we do not have if we are to avoid the worst impacts of the climate crisis. As over 500 scientists highlighted in an open letter to President Biden and other world leaders in early 2021: "Overall, for each kilowatt hour of heat or electricity produced, using wood initially is likely to add two to three times as much carbon to the air as using fossil fuels."

Even if large-scale carbon capture from wood combustion, gasification or pyrolysis became possible in future, it would not address the fundamental problem that forest ecosystems play a vital role in regulating the climate and sequestering carbon.

Logging and burning trees from forests not only produces carbon emissions but it also reduces the planet's carbon sinks which we need in order to keep global temperature rises below 1.5 degrees.

Therefore, we do not believe that bioenergy hydrogen production offers a means of reducing emissions at Grangemouth or of unlocking 'wider decarbonisation across the country.'

18 National Spatial Strategy
What are your overall views on this proposed national spatial strategy?

Biofuelwatch believes that the National Spatial Strategy needs to go further to tackle the climate and nature emergencies by placing a greater emphasis on preventing unsustainable developments such as fossil fuel and biomass plants.

Questions - Part 2 - National developments

19 Do you think that any of the classes of development described in the statements of need should be changed or additional classes added in order to deliver the national development described?

Biofuelwatch is extremely concerned that the draft NPF4 includes bioenergy within the classes of development described in the Statement of Need for the Industrial Green Transition Zones.

Far from supporting the decarbonisation of industrial sites such as Grangemouth, multiple scientific studies have shown that burning wood for energy is not 'carbon neutral' and it is as harmful for the climate as burning fossil fuels.
The climate impact of burning trees to generate energy was highlighted by over 500 scientists in a letter written to President Biden and other world leaders in February 2021: "As numerous studies have shown, this burning of wood will increase warming for decades to centuries. That is true even when the wood replaces coal, oil or natural gas. [...] Burning wood is also carbon inefficient, so the wood burned for energy emits more carbon up smokestacks than using fossil fuels. Overall, for each kilowatt hour of heat or electricity produced, using wood initially is likely to add two to three times as much carbon to the air as using fossil fuels."

This undermines the stated need for the national development to meet 'targets for emissions reduction' at St Fergus, Peterhead, and Grangemouth. We therefore urge the Scottish Government to remove bioenergy from the classes of development described in the Statement of Need for the Industrial Green Transition Zones.

20 Is the level of information in the statements of need enough for communities, applicants and planning authorities to clearly decide when a proposal should be handled as a national development?

More detailed information about the climate, biodiversity and health impacts of biomass burning should be provided for communities, applicants and planning authorities to enable them to evaluate whether proposals for bioenergy at Grangemouth and other sites should be handled as a national development.

Questions - Part 3 – National Planning Policy

22 Sustainable Places
We want our places to help us tackle the climate and nature crises and ensure Scotland adapts to thrive within the planet's sustainable limits. Do you agree that addressing climate change and nature recovery should be the primary guiding principles for all our plans and planning decisions?

Biofuelwatch strongly agrees that climate change and nature recovery should be the primary guiding principles for all plans and planning decisions.

Last year's IPCC Working Group 1 report made clear that we are facing a 'code red for humanity' and that we are at imminent risk of exceeding global temperature rises of 1.5 degrees if we do not reduce greenhouse gas emissions. As the UN Secretary General highlights: "The alarm bells are deafening, and the evidence is irrefutable: greenhouse-gas emissions from fossil-fuel burning and deforestation are choking our planet and putting billions of people at immediate risk. Global heating is affecting every region on Earth, with many of the changes becoming irreversible."

The 2019 IPBES Global Assessment Report on Biodiversity and Ecosystem Services warned that biodiversity is also in crisis with 1 million species already facing extinction as a result of human activity and the 'large-scale deployment of bioenergy plantations and afforestation of non-forest ecosystems' leading to negative side effects for biodiversity. Without urgent action, millions of people are at risk from the collapse of essential life-support systems for food, pollination and clean water.

Biodiversity is also facing an emergency in Scotland. The most recent State of Nature 2019 reports found that the abundance of species is falling at a faster rate in Scotland than in the rest of the UK and of the 6,413 species found in Scotland that have been assessed, 11% have been classified as threatened with extinction from Great Britain.

The 2019 Trondheim Conference on Biodiversity highlighted that more transformative solutions are now needed to halt global biodiversity loss, reduce global warming and achieve the Sustainable Development Goal for biodiversity to which Scotland is committed.

The National Planning Framework should play a key role in addressing the climate and nature emergencies by ensuring that fossil fuel infrastructure or false solutions like biomass are not supported in planning decisions.

The current wording in Draft NPF4 does not recommend that policies on climate and nature be given more weight than other policies. More detail is therefore needed on how these issues will be considered in planning decisions.

23 Policy 1: Plan-led approach to sustainable development.Do you agree with this policy approach? Do you agree with this policy approach?

Biofuelwatch supports a plan-led system of planning as it can enable more democratic community involvement and accountability.

Biofuelwatch supports the recommendations from Planning Democracy that proposals which do not comply with a Local Development Plan should have a strong presumption against approval. We also believe that planning proposals should comply with adopted Local Place Plan aspirations.

24 Policy 2: Climate emergency.Do you agree that this policy will ensure the planning system takes account of the need to address the climate emergency?

Policy 2a) Biofuelwatch strongly agrees that "significant weight should be given to the Global Climate Emergency" in all planning decisions but we believe that the NPF4 should go further by ensuring that the climate and biodiversity crises are a primary consideration in all planning decisions.

If Scotland is to help tackle the climate and nature emergencies, Biofuelwatch believes that we need a presumption against planning consent for new developments that will contribute to increased greenhouse gas emissions or the loss of biodiversity.

This includes ensuring that planning permission is not granted for new wood-burning biomass plants due to the detrimental biodiversity, climate and health impacts of wood combustion on a large scale, which includes the cumulative impacts from biomass combustion in Scotland.

We are also concerned about the references to off-setting as off-setting schemes are often used by corporations in order to greenwash their continued pollution.

Moreover, the focus on off-setting measures can be a dangerous distraction from the drastic cuts to emissions which are urgently needed to keep global temperature rises below 1.5C. We believe that the policy should make it clear that off-setting should be a last resort.

25 Policy 3: Nature crisis.Do you agree that this policy will ensure that the planning system takes account of the need to address the nature crisis?

Biofuelwatch welcomes NPF4's recognition that we are facing a nature crisis and believes that the biodiversity and climate crises are interlinked and should be given equal status within the National Planning Framework.

We strongly agree that development plans need to support 'the enhancement of biodiversity' and 'nature recovery'. However, we are concerned by the use of the word 'should' which suggests this is optional and the word 'facilitate' which does not require development plans to enhance nature restoration across the development plan area.

We therefore request that the wording of the draft NPF4 should go further in calling for development plans to ensure that developments do not have negative impacts on biodiversity.

26 Policy 4: Human rights and equality.Do you agree that this policy effectively addresses the need for planning to respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality?

Biofuelwatch strongly agrees with Policy 4a) that: 'Planning should respect, protect and fulfil human rights, seek to eliminate discrimination and promote equality' but feel that more detail is required to show how this policy would be put into practice.

In order for this policy to fulfil human rights, it is essential that planning decisions consider the human rights of communities around the world who are impacted by extractive industries supplying materials to Scotland.

As one of the first countries in the world to benefit from the extraction of fossil fuels during the Industrial Revolution, Scotland must also prioritise the human rights of communities across the world who are already suffering from the worsening impacts of climate change.

In Policy 4b, we believe that more emphasis should be given to the importance of enabling communities to participate fully in the planning process. While the principle of public participation in planning is widely accepted, it is not always

the case that ‘‘opportunities are available for everyone to engage in local development planning and the development decisions which affect them’ as members of the public currently face a number of disadvantages when they try to engage with the planning system. In particular, communities do not currently have equal rights to appeal planning decisions.

We support the recommendations of Planning Democracy that communities should have the same rights and opportunities as developers in order to achieve equality in the planning system and prevent unsustainable and polluting developments. These equal rights for communities include the right to appeal the planning decisions that are guided by the policies contained within NPF4. More detailed information on these policy recommendations can be found at: https://www.planningdemocracy.org.uk/

27 Policy 5: Community wealth building. Do you agree that planning policy should support community wealth building, and does this policy deliver this?

Community wealth building is not defined in Draft NPF4 and could be interpreted in different ways by different people. Biofuelwatch believes that community wealth building should mean that social and environmental values are prioritised in planning decisions.

29 Policy 7: Local living.Do you agree that this policy sufficiently addresses the need to support local living?

Biofuelwatch welcomes the recognition of the importance of providing communities with local access to natural spaces as well as to other facilities.

33 Policy 11: heat and cooling.Do you agree that this policy will help us achieve zero emissions from heating and cooling our buildings and adapt to changing temperatures?

Biofuelwatch supports proposals to achieve ‘zero emissions from heating and cooling our buildings’ and we welcome the reference to large scale heat pumps.

However, we believe that more detail needs to be provided in the NPF4 draft about how ‘zero emissions heat’ could be provided for homes. In particular, there is no mention of the important role that low carbon heat pumps can play in replacing fossil fuel and wood-fired heating in homes.

Heat pumps are a crucial means of reducing carbon emissions from homes as they are three times more efficient than gas boilers and can be powered through electricity from renewable energy such as wind and wave power.

Moreover, the recent UK government-funded 'Electrification of Heat' project found that heat pumps can be fitted successfully in all types of homes, including detached houses, older properties and high rise flats.

We do not agree with the proposal in policy 11g) to support domestic biomass systems where networked systems are not available because of the harmful impacts of biomass boilers on forests, biodiversity, air quality and the climate.

Studies have shown that burning wood for energy is not carbon neutral as it will take decades or longer for new trees to grow and absorb the emissions produced by logging and transporting trees that are burned today. This is time we do not have if we are to avoid the worst impacts of the climate crisis.

As over 500 scientists highlighted in an open letter to President Biden and other world leaders in early 2021: "Overall, for each kilowatt hour of heat or electricity produced, using wood initially is likely to add two to three times as much carbon to the air as using fossil fuels."

The UK is already importing vast quantities of wood to burn as biomass energy in power stations and much of this wood comes from clear-felled biodiverse forests in the Southern USA, Canada, Estonia and Latvia. This logging and biomass burning is leading to forest destruction, biodiversity loss, the pollution of communities and higher carbon emissions.
Planning support for domestic biomass boilers will add to the amount of wood that the UK burns and will lead to increased carbon emissions, regardless of whether this wood is sourced from within the UK or is imported. Subsidising biomass for domestic use in homes is also likely to directly or indirectly result in further forest degradation and biodiversity loss.

We are equally concerned about the air pollution impacts of biomass boilers. Wood-burning biomass boilers emit nitrogen oxides (NOx), - NO2 has been linked to breathing problems. They also emit PM10 including PM2.5 particulates which can contribute to the risk of developing heart disease and lung cancer. The World Health Organisation highlights that there are no safe levels of PM2.5 particulates for human health.

As heat pumps have been found to be suitable for all types of properties, we would urge the Scottish Government to include policies within the NPF4 for genuinely low carbon options such as high temperature heat pumps for homes in Scotland rather than dangerous false solutions like biomass boilers.

36 Policies 14 and 15 – Health, wellbeing and safety.Do you agree that this policy will ensure places support health, wellbeing and safety, and strengthen the resilience of communities?

Biofuelwatch strongly agrees that places should support 'health, wellbeing and safety for all' and reduce health inequalities. We support policy 14b) that 'development proposals should not be supported where significant adverse health effects are likely to occur.' We also support policy 14c) that 'development proposals that would have a significant adverse effect on air quality should not be supported.'

In particular, we believe that these policies mean that planning applications for biomass power stations should not be considered for development due to the damaging health and air quality impacts of wood burning for energy.

Burning wood biomass has been associated with a range of health impacts from emissions, including cancers, cardiac and respiratory complaints and asthma attacks.

The World Health Organisation emphasises that small particulate pollution has health impacts even at very low concentrations and that there are no safe levels of exposure to particulate emissions.

We feel that Policy 15 on Safety should be strengthened to ensure that developments which pose threats to health and safety should not be supported.

For example, wood pellet plants and biomass plants can expose workers and communities living nearby to wood dust. The Control of Substances Hazardous to Health Regulations 2002 (as amended) classifies wood dust as a hazardous substance. The Health and Safety Executive warns that exposure to wood dust can cause a range of serious health impacts, including asthma, respiratory problems, skin irritation and nasal cancer.

Planning support for any new biomass plants or wood pellet plants in Scotland would add to these health and safety risks to workers and to local communities through exposure to wood dust and harmful particulate emissions.

40 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?

Biofuelwatch welcomes the stated aims in Policy 19 to support renewable wind and solar power as well as energy storage in order to reduce carbon emissions and tackle the climate crisis, subject to siting of such developments not adversely impacting on biodiversity.

We are, however, very concerned that the terms 'renewable energy' and 'low carbon fuels' are not currently defined in Policy 19 and they could be used to refer to wood biomass energy.

The current lack of a definition of 'renewable energy' could lead to planning permission being granted for new wood-burning biomass plants, despite the detrimental biodiversity, climate and health impacts of wood combustion on a large scale.

We therefore ask that the draft NPF4 includes a planning presumption against new medium-sized and large-scale wood burning plants. Please note that we are using the terms 'medium-sized' and 'large-scale' to have the same meaning as under environmental permitting rules.

The UK as a whole is already heavily dependent on net imports of wood and wood products and imported 9.1 million tonnes of wood pellets and 7.2 million cubic metres of sawnwood in 2020. This means that there is no possibility of mobilising any spare wood resources for energy without it resulting directly or indirectly in more pressure on forests worldwide. A peer-reviewed study published in 2020 shows that across Europe, there has been a steep increase in biomass loss as well as a rise in the size and number of forest clearcuts since 2015, correlating with the subsidy-driven increase in demand for wood for energy.

Any increase in support or demand for biomass, including medium-sized biomass power plants, has significant potential to exacerbate this disruption and biodiversity loss. This would directly contradict the Universal Principles in Part 3 of the NPF4 to support nature recovery and to "ensure Scotland adapts to thrive within the planet's sustainable limits."

Moreover, wood bioenergy in either medium- or large-scale power stations should not be considered to be 'green energy' or included in the National Planning Framework because multiple scientific studies show that burning wood for energy in power stations generates significant carbon emissions and it is not "carbon neutral".

Burning wood leads to an immediate increase in carbon emissions equal to or greater than the burning of coal (per unit of energy), creating a "carbon debt" which increases over time as more trees are harvested for continuing biomass combustion. It will take decades or longer for new trees to absorb the emissions produced by logging, transporting and burning trees today, including wood from plantations in Scotland. This is time we do not have if we are to avoid the worst impacts of climate breakdown.

By comparison, scientific studies have shown that renewable technologies such as solar and wind power produce net carbon dioxide savings within months to a few years.

We therefore ask that the Scottish Government introduces a planning presumption against new medium-sized and large-scale wood burning plants.

We are also concerned about Policy 19i) which states that 'proposals for negative emissions technologies and carbon capture should be supported in principle.' Bioenergy with carbon capture and storage technology has been proposed as a means of drawing carbon dioxide out of the atmosphere to achieve 'carbon negative' emissions.

However, BECCS technologies to capture carbon dioxide from burning biomass remain technically and economically unproven and there is no clear evidence that they can ever be implemented sustainably. Moreover, the concept of BECCS as a 'negative emissions' technology is based on the false assumption that burning wood for energy is carbon neutral.

Even if BECCS technology were ever to become technically and commercially viable, it could result in greater carbon emissions due to increased logging and/or land use change. This would make it far more difficult to achieve Scotland's climate change targets. On the other hand, relying on a technology which cannot be implemented in order to reach climate targets in Scotland could also lead to targets being missed.
The large-scale use of wood biomass energy is already seriously disrupting biodiverse forest ecosystems throughout the globe and, correspondingly, the communities and wildlife that maintain and rely on them. Any increase in support or demand for biomass has significant potential to exacerbate this disruption.

We therefore urge the Scottish Government to avoid incorporating support for negative emissions technologies such as BECCS into the draft NPF4. Priority should instead be given to forest protection and restoration, and investment into genuinely sustainable and renewable energy such as wind, tidal and solar power.

41 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?

Policy 20i) Biofuelwatch believes that development proposals for incinerators should not be supported due to concerns over the air quality, health, environmental and climate impacts of burning waste in incinerators. We fully support Friends of the Earth Scotland's call for an urgent moratorium on new waste incinerator capacity in Scotland:
https://foe.scot/resource/incineration-briefing/

50. Policy 32: Natural places. Do you agree that this policy will protect and restore natural places?

Biofuelwatch welcomes the statement that "the natural environment underpins our economy, health and wellbeing, biodiversity and climate resilience. We also welcome the recognition of the need to protect, restore, and enhance nature.

In Policy 32a), we believe that the term 'valued' should be clarified in reference to natural assets and the wording should be strengthened to say that all SSSI sites must be identified and protected.

We welcome the reference to nature networks in Policy 32a) but it is not clear in the draft planning framework how these nature networks will be delivered. We believe that there is a need for a national nature network across Scotland and the policy must reflect that biodiversity needs to be protected everywhere, not solely in the most protected sites.

In Policy 32c), Biofuelewatch believes that the policy needs to set out that development should not damage SSSI sites and clarify that there is a very strong presumption against this. If this is not done, developers may think it is acceptable to damage protected wildlife areas.

If the loss of biodiversity is to be halted and reversed, we also believe that the focus of protecting and restoring natural sites cannot simply be on sites which are already protected. Non-statutory sites, such as local nature reserves, and wildlife habitats everywhere are also of the utmost importance in reversing biodiversity loss. The Policy should emphasise that harm to nature must be avoided.

52 Policy 34 – Trees, woodland and forestry: Do you agree that this policy will expand woodland cover and protect existing woodland?

Biofuelwatch welcomes the acknowledgement of the importance of trees and woodland to meeting climate targets and reversing biodiversity loss.

We support the policy that existing biodiverse woodlands should be protected wherever possible but more clarification is needed to define what is meant by 'woodland' within the NPF4 and to specify whether the term also refers to conifer monocultures.

We also support the proposal in Policy 34a) that 'Local development plans should identify and protect existing woodland and potential for its enhancement or expansion to avoid habitat fragmentation and improve ecological connectivity.'

Protecting existing biodiverse forests and allowing them to grow to their full ecological potential is recognised by scientists as one of the most effective ways of reducing the climate crisis whilst also supporting biodiversity: "As

proforestation increases forests carbon-sequestration abilities, IUCN [The International Union for the Conservation of Nature] has ranked proforestation management as one of the most effective nature-based solutions to fight against biodiversity and climate crises." In contrast, monoculture conifer plantations support few species.

Policy 34b) We agree that development proposals should not be supported where they would result in 'any loss of ancient woodlands, ancient and veteran trees, or adverse impact on their ecological condition.' We also welcome the policy that development proposals should not be supported where they would lead to 'adverse impacts on native woodlands, hedgerows and individual trees of high biodiversity value.'

Moreover, we support the proposal that local development plans should identify and protect existing woodlands and identify potential for woodland expansion. While we are in favour of woodland expansion, however, this needs to mean the expansion of biodiverse woodlands. We are concerned about the increase in monoculture conifer plantations in Scotland. Trees such as Sitka Spruce support fewer species than biodiverse woodlands and are less resilient to the impacts of climate change as Scotland's weather becomes more unpredictable and extreme. We therefore request that the NPF4 does not support proposals for new monoculture plantations and instead supports the gradual replacement of these plantations with biodiverse woodlands. Woodland expansion must also be sensitive to other habitats that have a high biodiversity value such as wetlands and grasslands.