



National Planning Framework 4 Early Engagement – Policies

PRESERVING PEATLAND

Scottish Planning Policy (2014):

Paragraph 205 (Valuing the Natural Environment) indicates that where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO₂) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO₂ to the atmosphere. Developments should aim to minimise this release.

Paragraph 241 (Promoting Responsible Extraction of Resources) confirms that policies should protect areas of peatland and only permit commercial extraction in areas suffering historic, significant damage through human activity and where the conservation value is low and restoration is impossible.

Table 1 of the spatial framework for onshore wind confirm categorises “carbon rich soils, deep peat and priority peatland habitat” as areas of significant protection. In these areas wind farms may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.

What has changed since 2014?

- The Scottish Government has declared a climate emergency and an ambition that Scotland ends its contribution to climate change by becoming net zero emissions by 2045.
- The Planning (Scotland) Act 2019 includes a requirement for the Scottish Ministers to have regard to the desirability of preserving peatland when preparing the revised NPF.
- Research undertaken by Ironside Farrar on the adoption of Scottish Planning Policy in local development plans¹ suggests that policies relating to the protection of carbon rich soil throughout SPP were confusing and the approach taken does not align across policy topics. The terminology used includes carbon rich soils, peat, deep peat, peatland and priority peatland habitat. The words ‘peat’ and ‘peatland’ mean different things to different people and are often used interchangeably. It was suggested that NPF should set a clear framework for the approach to carbon rich soils. Lack of guidance on how authorities should calculate the effects of development on carbon dioxide emissions was also raised.
- Publication of Scotland’s first National Peatland Plan (2015) sets out a vision for peatlands to be valued for multiple benefits, with improvements in the protection and condition of peatland.

¹ [Adoption of Scottish planning policy in local development plans](#)

- The Scottish Government's current Climate Change Plan sets out targets to restore *50,000 hectares of peatland by 2020, and 250,000 hectares restored (40% of Scotland's degraded peatland) by 2030.*
- To-date, almost 20,000 hectares of degraded peatland has been restored since the project started in 2012. Challenges such as weather impacts and contractor capacity have played a significant role in what can be delivered from year-to-year.
- The Climate Change Committee's evidence to ECCLR Committee, on 14 May 2019, emphasised the need for increased afforestation targets and action at UK level, and substantial changes in approach to land-use in Scotland – around 20% of lowland pasture needs to be repurposed for forestry and/or bioenergy. The CCC's net-zero report says that low-carbon farming practices, afforestation, agroforestry and peatland restoration all have a crucial role to play in reducing emissions by 2050.
- The Climate Change Act meets the Committee on Climate Change's recommendation of a net-zero greenhouse gas emissions target for 2045.
- Following the Climate Change Committee report earlier this year, and the First Minister's announcement of a Climate Emergency in Scotland, there has been an increased interest in Scotland's land use and soils to capture carbon and reduce CO2 emissions.
- *Protecting Scotland's Future: The Government's Programme for Scotland 2019-20* confirms that the Scottish Government will seek to phase out the use of horticultural peat by increasing uptake of alternative growing media substrate.
- The Scottish Government has confirmed an intention to review permitted development rights around peatland restoration.
- Continued political interest in the set-aside of land for climate change mitigation – emissions sequestration – purposes which may also be a means of attracting investment.

Proposed key objective of NPF4: To have regard to the desirability of preserving peatland so that climate change benefits of reducing emissions and other benefits including to air and water quality, biodiversity and habitat creation and flood alleviation are realised.

Issues to consider:

- What policy criteria should be included in NPF4 to ensure that the impacts arising from new development on peatland are fully considered?
- Do existing documents, particularly the Scottish Government, Scottish Natural Heritage, SEPA (2017) Peatland Survey: Guidance on Developments on Peatland² ensure appropriate mechanisms are in place for considering and addressing impacts?
- Are there any circumstances in which proposals for commercial peat extraction should be considered acceptable i.e. on degraded peatland?

² [Peatland Survey. Guidance on Developments on Peatland](#)

- Are there other land types which should be considered for protection due to their contribution to greenhouse gas emissions reduction?
- Should the emissions sequestration opportunity lost when (non-peat) land use change occurs be factored into decision making on development? Is there a level of lost opportunity which is acceptable? Is it possible to re-create the sequestration opportunity as a result of development?
- Should the emissions released from the development of greenfield land be factored into decision making on development? Is it acceptable for this release to be mitigated, possibly elsewhere?

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