



LINK Response to the Scottish Government's "*Planning Delivery Advice: Housing and Infrastructure*" draft advice.

Response sent by email from Aedán Smith, Convenor of LINK Planning Group, to the Scottish Government (deliveryadvice@gov.scot) on 31 March 2016.

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Please find some short comments on behalf of the Scottish Environment LINK Planning Group on the above draft Advice. I can confirm that the LINK Planning Group are supportive of the principle of providing advice on housing and infrastructure but would not support the advice as drafted without the changes set out below.

- The LINK Planning Group is particularly concerned that draft Advice does not give appropriate weight to the need to provide green infrastructure in housing developments. This is a serious oversight given the importance of green infrastructure set out in the NPF and SPP.
- The importance of some brownfield land for nature (including the possible unsuitability of some brownfield land for development because of its importance for nature) needs to be recognised. This should be set out alongside a reminder to planning authorities of their statutory duty to further the conservation of biodiversity. As currently drafted, the Advice risks this being overlooked, leading to projects being proposed which would result in conflict and delay.
- The implications of climate change, including the need for all new and existing developments to include measures to mitigate and adapt to climate change, needs to be addressed and integrated throughout the Advice. Given the importance of this issue it is very surprising that this has not been addressed directly in the Advice.
- It is surprising that no conservation organisations seem to have been consulted in the drafting of the Advice. This needs to be rectified before a final version is produced.

I hope these comments are of assistance and we look forward to hearing how the Advice will be improved.

This response is specifically supported by the following Planning Group members:

- Buglife
- Froglife
- RSPB Scotland
- The Badenoch and Strathspey Conservation Group
- The Scottish Wild Land Group
- The Scottish Wildlife Trust
- Woodland Trust Scotland

Kind regards

Aedán
(on behalf of LINK Planning Group)

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