



## Introduction

This document is intended to give an overview of LINK's Planning Group's top advocacy priorities for NPF4. The comprehensive [LINK Consultation Response to the NPF4 Interim Position Statement](#) illustrates the broad spectrum of issues that LINK works on and which NPF4 will influence.

## Background: The need for a transformative change to the Scottish planning system

Change is needed to ensure the Scottish planning system can enable sustainable development and prevent development which is not consistent with the Scottish Government's Climate Change Plan and the aspirations of the Biodiversity Strategy – Statement of Intent 2020. NPF4 is the final national, strategic planning document to take us through to 2045, the target year for net-zero. It is also a key document in enabling Scotland to achieve the halting and reversal of biodiversity loss that will be required by the new suite of global and national biodiversity targets.

## Top Priorities for NPF4 to Deliver for Nature, Climate and People.

### Protecting and enhancing nature

*Context:* The 2019 Planning Act set a new direction for planning in Scotland: to manage the development and use of land in the long-term public interest. Planning must ensure that every development contributes toward achieving net-zero and halting and reversing biodiversity loss, aligning with the goals of the biodiversity strategy and climate change plan. A transformation of the Scottish planning system also requires a transformation of Scotland's National Marine Plan, ensuring it incorporates actions from the EU Biodiversity Strategy for 2030. Adequate resources must be allocated to local authorities and Scotland's regulatory authorities to ensure these critical challenges can be delivered.

Additionally, UN Sustainable Development Goal 15.9 requires nature to be considered at every stage of planning. With the human right to a healthy environment is incorporated into forthcoming human rights legislation, as recommended by the National Taskforce,<sup>1</sup> this will also require public authorities to comply with the right across all areas of policy, including planning, and would provide a clear steer for new developments to be designed in a way that enhances and improves our natural environment.

The findings of the Dasgupta Review<sup>2</sup> - which sets out an urgent need for a shift in economies and development to treat nature as an asset - must also be incorporated into our planning system by accounting for and valuing our interactions with nature across society. Likewise, a Circular Economy Bill will require the planning system to adopt more circular practices, where products are easily

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<sup>1</sup> <https://www.gov.scot/publications/national-taskforce-human-rights-report-recommendations-easy-read/>

<sup>2</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/962785/The Economics of Biodiversity The Dasgupta Review Full Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962785/The_Economics_of_Biodiversity_The_Dasgupta_Review_Full_Report.pdf)



brought back into use or repurposed. This would ensure Scotland makes significant progress toward net-zero climate targets and reducing our impact on the natural world.

*Ask:* all developments must deliver demonstratable and measurable positive effects for biodiversity.

*Ask:* nature must be considered as the key asset on which livelihoods, economies and societies depend and must be considered in every aspect of planning.

*Ask:* NPF4 must align with a revised National Marine Plan, that drives urgent ocean recovery, by committing to strict protection for at least 10% of Scotland's seas and high protection for at least 30% ensuring the protection and restoration of marine species, habitats and ecosystem services throughout Scotland's seas.

*Ask:* NPF4 and the strategic transport plan must be linked; large scale intercity roads infrastructure needs to be redefined or revised as part of the goals for net zero, a wellbeing economy, and greener places set out by the Scottish Government in the NPF4 Position Statement.

*Ask:* there must be presumption in favour of enhancing, repurposing or maintaining existing infrastructure and buildings to make continued and more efficient use of existing assets, as part of a circular economy.

*ASK:* NPF4 must consider the sustainability of housing as a whole, including the use of land. Housing targets should be met by reusing existing infrastructure and bringing empty homes into use, remediating and reusing appropriate brownfield sites before considering new build on greenfield sites.

### Creating a Scottish Nature Network with nature-based solutions

*Context:* Restoration of biodiversity is key to reaching net-zero and coping with the consequences of climate change. The implementation of nature-based solutions on land and sea should be maximised to address the twin crises of nature loss and climate change, with additional benefits for people's physical and mental health. Nature based solutions are defined by IUCN as 'actions to protect, sustainably manage, and restore natural and modified ecosystems that address societal challenges effectively and adaptively, simultaneously providing human well-being and biodiversity benefits.'<sup>3</sup>

The policies in NPF4 on peatlands, woodland and trees must be strengthened in order to maximize the benefits for nature and climate. Protecting and restoring Scotland's peatlands is vital for meeting our net-zero climate target and delivering a healthy freshwater environment. Native woodland and trees contribute significantly to biodiversity, storing and sequestering carbon to meet Scotland's emission reduction targets, as well as benefiting people's wellbeing. There must be stronger protection for our most precious trees and habitats, including ancient woodland. There must be a requirement for additional tree planting in urban settings to store carbon, manage the climate and air quality and provide pleasant places for people to live and work.

NPF4 must also ensure protection and restoration of Scotland's marine environment in order for Scotland to meet our net-zero targets and play our part in reducing global greenhouse gas emissions. Scotland's blue carbon environments store 9,636 Mt CO<sub>2</sub>-eq (Megatonnes of CO<sub>2</sub>-equivalent), approximately the same as that stored by terrestrial ecosystems (9, 546 Mt CO<sub>2</sub>-eq) such as peatlands, forestry and soils. Annually, Scotland's blue carbon stores sequester 28.4 Mt CO<sub>2</sub>-eq<sup>4</sup>, about three times the annual carbon sequestration of Scottish Forestry. This is a significant

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<sup>3</sup> <https://www.iucn.org/theme/nature-based-solutions>

<sup>4</sup> [Blue Carbon | Scottish Parliament](#)



opportunity to pioneer blue carbon protection, restoration and enhancement, for example for seagrass beds and native oyster beds.

Natural infrastructure's key role in tackling the ongoing nature and climate emergency requires that we plan for blue and green infrastructure in a coordinated way. This is best done through the adoption of a Scottish Nature Network as a National Development. A Scottish Nature Network would promote an overarching ambition for restoring and reconnecting nature and contains a spatial vision of where and what could be achieved. By aligning NPF4 with the Land Use Strategy and identifying opportunities to align emerging Regional Spatial Strategies with future Regional Land Use Partnerships and Frameworks, we would develop common purpose and identify where best to target collective action and investment. A Scottish Nature Network would allow planners, local authority and industry to break away from business as usual and embed nature in all planning decisions to secure its recovery, with the wider social benefits it would bring and the contribution it would make toward the delivery of net-zero goals. The system adopted should ensure positive effects for biodiversity that are tangible, measurable and evidenced.

*Ask:* NPF4 must prevent the granting of any new permissions for peat extraction for horticulture. All existing licenses must be repealed by 2023 and support for the restoration of existing extraction sites should be provided.

*Ask:* NPF4 must include specific provisions to increase protection for ancient woodland and veteran trees, recognizing that these are irreplaceable, make a significant contribution to biodiversity and carbon sequestration, and our health and wellbeing.

*Ask:* [a Scottish Nature Network](#) must be adopted as a National Development in NPF4 to support and maximize the benefits of realizing bespoke, locally relevant nature networks at the Local Authority Level.

*Ask:* Regional Land Use Frameworks and Regional Spatial Strategies must be produced in a strategic, holistic and coordinated way and NPF4 must take them into account. There needs to be clear opportunities for engagement with NGOs to ensure that high level aims are translated into policies that really influence planning decisions.

### **Facilitating a planning system that meaningfully engages with communities**

*Context:* NPF4 is an opportunity to increase public engagement with the way Scotland's physical environment is changing. NPF4 must build a stronger focus on place-based actions through 20-minute neighbourhoods and proactively enable community aspirations. Given that the Scottish Parliament has not granted an equal right of appeal to communities, NPF4 needs to give communities the tools and resources to help find sustainable development solutions for their local area and Scotland.

*Ask:* give greater status to community aspirations by ensuring that the ambitions of Local Place Plans are responded to by developers and that Local Place Plans are given status within relevant Local Development Plans.

*Ask:* NPF4 must ensure that 20-minute neighbourhoods are defined and designed with the climate and biodiversity crises in mind.

### **Proactively plan for the expansion of new energy**



**Context:** NPF4 must enable the expansion of renewable energy generation within a spatial framework by mapping areas of development opportunity and managing potential conflicts regarding land use and impacts of energy systems on Scotland's environment. LINK members welcome recognition of the need for a spatial framework that pro-actively steers developers towards land most likely to be suitable for development and away from land that is to be safeguarded – such as National Parks, National Scenic Areas, Wild Land Areas, healthy peatlands, native and ancient woodlands, and marine protected areas.

**Ask:** enable the growth of renewable energy generation in harmony with nature by identifying and addressing its impacts on our natural world.

**This response is supported by the following LINK member organisations:**

Association for the Protection of Rural Scotland

Badenoch & Strathspey Conservation Group

CIEEM

Environmental Rights Centre for Scotland

Froglife

Jhon Muir Trust

Planning Democracy

RSPB Scotland

Scottish Wildlife Trust

Woodland Trust Scotland

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

**For more information contact:**

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