



## **Draft National Planning Framework 4**

### **Consultation Response**

**31<sup>st</sup> March 2022**

#### **Introduction to Scottish Environment LINK**

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.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland. LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Planning Group.

#### **Response**

##### **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?**

The Scottish Government has stated on several occasions that NPF4 will deliver a 'transformation' in Scotland's planning policy and deliver real progress on meeting climate change goals and addressing biodiversity declines. Disappointingly, we feel the proposals set out do not match that level of ambition and believe the approach lacks a truly transformative agenda — despite awareness of the urgent need to radically scale up action to tackle the climate and nature emergency and create fairer communities.

We welcome the government's mention of the climate emergency and biodiversity crisis throughout the draft NPF4. This is vital for signalling to planners, communities and sectors across the economy that reaching net zero emissions and restoring nature is a central ambition of this government. We applaud the increased attention given to the natural environment in this updated Framework, for example the draft states:

“To achieve a net zero, nature-positive Scotland, we must rebalance our planning system so that climate change and nature recovery are the primary guiding principles for all our plans and decisions.” (Draft NF4, p.68)

However, the draft currently lacks a clear delivery mechanism for achieving this and putting in place the policy objectives – timescales remain vague and detail of how these will be implemented is lacking. We note that the government intends to publish a ‘draft delivery programme’ (p.114) alongside the final NPF4 - this should set out clear timelines and regular reporting on progress to deliver the programme. While we welcome the sentiment, we are unclear what is meant by ‘guiding principles’ in this context - for example, will there be a link drawn with the environmental principles adopted by the UK Withdrawal from the European Union (Continuity) (Scotland) Act 2021.

The guidance on the 2021 Act and the EU environmental principles has recently been subject to consultation; but has yet to be finalised and formally issued. Thus, the relevant sections of the 2021 Act are yet to have legal effect. Nevertheless, the Scottish Government’s high-profile policy of “keeping pace” with EU ambitions and seeking to “maintain and exceed EU environmental standards” wherever possible would suggest that these principles should have a higher and clearer profile in such an important document as the NPF4. Notwithstanding the absence of any legal obligation, LINK considers that NPF4 should demonstrably be finalised having “due regard to” these principles, and that it should clearly state any decisions or actions taken in implementing NPF4 should have similar regard.

Most worryingly for LINK members is that the current draft needs to go further to support decision makers to avoid ‘business as usual’ by providing policy that effectively secures action on climate and nature in new developments/proposals. Despite the welcome rhetoric on climate and nature, there is little in the draft that actively supports the inclusion of nature and climate goals in new developments.

In the context of the nature and climate emergency we need to move beyond a planning system that encourages actions to one that demands action. As noted in the Dasgupta review - “*our economies, livelihoods and well-being all depend on our most precious asset: Nature....*” and with less than 10 years to achieve Scotland’s ambitious 2030 climate target of 75% emissions reduction, a robust NPF4 must require planners to take a new approach to assessing developments to bring about a true transformation in planning throughout Scotland’s towns, cities and rural areas. We urge the government to consider the role the planning system can play as a regulator, requiring high environmental standards and embedded circular economy principles to attain climate and nature targets and thus making the changes that support the long-term public interest.

**2: Liveable Places: 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?**

LINK agrees that transformative change is needed to ensure a just transition; however the approach on its own will not result in better, healthier and more vibrant places to live. Success of the approach will be measured by how it is implemented. We welcome the emphasis on wellbeing, biodiversity restoration and vibrant places which do not rely on private car use. We agree that nature restoration and access for everyone to nature is crucial to achieving healthy, sustainable places.

Although planning has an important part to play in the health and vitality of the places in which we live, it must integrate with other strategies and policy to deliver places that are healthier and more vibrant in the long-term.

**3: Productive Place. Do you agree that this approach will deliver out future places which will attract new investment, build business confidence, stimulate entrepreneurship, and facilitate future ways of working, improved economic, social and environmental wellbeing?**

As noted in response to questions 1 and 2, the aims themselves will not result in a change but success of such an approach will be measured by how it is implemented.

LINK does welcome the proposed shift to a wellbeing economy and the recognition that a transformational approach is needed to tackle the climate and nature crises. However, there exists a yet unresolved tension in The National Strategy for Economic Transformation, specifically in terms of economic opportunities and the drive for productivity and being able to achieve this within environmental limits and whilst actively seeking to achieve climate and biodiversity objectives. This issue is present in the overall approach set out in Productive Places.

Although planning has an important part to play in the economy, it must work with other strategies and policy and it seems unlikely that the approach in NPF4 alone will deliver places that fulfil all the ambition set out in the question.

**4: 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?**

LINK members welcome the statements under 'Distinctive Places' that commit to responding to the global biodiversity crisis by putting nature recovery and connected blue and green infrastructure at the heart of all future places and of safeguarding our shared heritage for future generations. This, in part, reflects the importance of LINK's ask for a national Scottish Nature Network to help facilitate and guide such connectivity.

The Scottish Government has resisted LINK's previous calls (see under Q21 below) for new National Parks to be included as a National Development in NPF4, primarily because the location or locations are not yet decided. If, despite the commitment in The [Scottish Government and Scottish Green Party - Shared Policy Programme](#), this is still the case, we suggest that the creation of one or more new National Parks is highlighted at the start of the Spatial Strategy under Distinctive Places, as the stated aspirations there very much align with the aims of National Parks in the 2000 Act. The new Park or Parks will be designated within the timeframe of NPF4 and will have significant implications for the planning system in those area(s), but more importantly can be a further tool in moving to being a more "nature-positive and resource efficient" country.

**5: Do you agree that the spatial strategy will deliver future places that overall are sustainable, liveable, productive and distinctive?**

LINK does not agree that the spatial strategy will deliver places that are sustainable, liveable, productive and distinctive. Although we welcome much of the rhetoric, particularly with regard for the need for a nature positive, net-zero Scotland, this will not deliver the much needed change on its

own. The planning system needs to respond to the climate and nature crisis, including via robust policy and decision making to change the culture of all planning stakeholders.

**6. Do you agree that these spatial principles will enable the right choices to be made about where development should be located?**

The six overarching principles are presented as **the basis for the NPF strategy and policies for building a “climate conscious and nature-positive future”** and are welcomed. There is concern that without further clarity on how these principles will directly influence policy and decisions, that the ‘right’ choices will not be made. In light of this, one improvement that would be helpful is for links to be made with other National Strategies and legislation that underpins or reinforce these principles to be noted here. The previous NPF included a table of a policy hierarchy. For example, for rural areas it could explain how these six principles and the resulting policies interact with the Land Use Strategy.

Under the principle (e) of urban and rural synergy it states ‘we will improve green infrastructure to bring nature into towns and cities, connecting people with nature, building resilience and helping our biodiversity to flourish’. This equally needs to apply to rural areas. There is a need to protect habitat where it is, whether rural or urban and increase nature connectedness.

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

The national spatial strategy provides positive support for all economic sectors, industries and environmental assets and yet provides little in the way of addressing or managing the potential conflicts and tensions that may arise between these. This is particularly relevant in the context of categorically requiring action on the nature and climate crisis. Further explanation is required on what needs to change and how different land uses will be accommodated as Scotland moves toward a net-zero and nature positive future. For instance, there is a required integration of NPF4 with other complementary strategies and policies, specifically the Land Use Strategy and regional land use partnerships that share common objectives with the Framework.

Another example of what could be included is under North and West Coast Innovation where it is recognised that “There are opportunities for local projects across this area to come together and create an enhanced nature network which benefits quality of life and contributes to biodiversity recovery and restoration as well as carbon sequestration.” However, this is the case across Scotland and demonstrates again the opportunity offered by LINK’s call for a national Nature Network (further explained in response to question 19). Similarly, commitments to support Nature-based Solutions and natural capital can be applied equally across all areas.

**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?**

For several years, Scottish Environment LINK has called for the government to establish a Scottish Nature Network, also known as a national ecological network. In response to the government’s Call

for Views in 2020, LINK called for a Scottish Nature Network to be set as a national development to deliver bigger and better sites for nature and to ‘enable delivery of green and blue infrastructure, restoration of nature and the ecosystem services that underpin societal wellbeing.’

We are pleased that some of these ideas have been incorporated into the proposal to expand the Central Scotland Green Network (CSGN), and that nature networks are mentioned throughout the draft document. Such projects are needed if Scotland is to make headway in reversing biodiversity declines and delivering vital nature-based solutions to climate change. This national development will bring additional benefits of giving communities in the central belt greater access to nature, which has proved to be an important source of wellbeing and physical health during recent months of Covid-19 restrictions.

However, we think the current proposal could go further by taking control of the opportunity and recognise the part it can play in supporting and responding to the nature crisis. LINK members ask the government to consider the following changes to this proposal:

- Set out a clear requirement for all local authorities to deliver projects that would create and protect a strategic national Nature Network, extending beyond the central belt. To also include the mechanisms by which a Nature Network will be supported through development.
- Commit to providing additional financial resources to planning authorities to allow for the recruitment of more biodiversity officers within local authorities to work on the roll out of a national Nature Network. 4
- Give a clear indication of the timescale for delivering a Nature Network in central Scotland and beyond.
- Adopt the IUCN definition of nature-based solutions and be clear that the Nature Network is to deliver a range of habitats that aid carbon sequestration (such as restoring grasslands and protecting carbon-rich marine sediments).

Additionally, national developments must contribute toward positive effects for biodiversity. The wording of Policy 3 (as finally drafted) should be repeated within Part 2 to ensure clarity on the expectations for national developments.

**21. Do you think there are other developments, not already considered in supporting documents, that should be considered for national development status?**

Scottish Environment LINK would like to see the creation of new National Parks included in the list of National Developments. The concept was previously assessed and deemed to be “Broad strategy rather than specific project or development proposals” and not suitable for this status (Annex D, Report of Assessment for the Draft National Developments).

However, given the Scottish Government’s firm commitment to designate at least one new National Park in the current parliamentary session, this decision should be reconsidered. New National Parks will be place-based; of national status; have implications for the planning regime of any area selected, and, most importantly, the aims of National Park status will help address the nature and climate emergency which is a key ambition of NPF4. The [Scottish Government and Scottish Green](#)

[Party - Shared Policy Programme](#) recognised that National Parks can benefit the economy and the environment, “support progressive development, address the climate emergency in the way we use our land, and improve public and community wellbeing” (p.40) and committed to funding this.

### 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?**

Yes, LINK members strongly agree that addressing climate change and nature recovery should be at the heart of the planning system and decision making. We welcome the inclusion of the importance of considering emissions from the whole life cycle of developments.

**23: Policy 1. Plan Led System. Do you agree with this policy approach?**

LINK members strongly support a plan led system of planning. Policy 1 seems simply a reiteration of primary legislation, (with the addition of the UN Sustainability Goals). The Town and Country Planning (Scotland) Act 1997, as amended, states, “The purpose of planning is to manage the development and use of land in the long-term public interest”.

The policy should further elucidate how a plan led system should be delivered.

The policy should state that developments which do not comply with the development plan will be strongly discouraged.

**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?**

LINK members agree that significant weight should be given to the climate emergency when assessing development proposals and with taking account of emissions over a development’s entire lifecycle.

Policy 2 should apply to Local Development Plans as well as proposals (planning applications) i.e. The climate emergency must be given significant weight and priority in Local Development Plans.

In part (c) of this policy, we ask the government to provide more detail on what is meant by allowing planning authorities to grant exemptions to applicants who ‘[provide] evidence that this level of emissions is the minimum that can be achieved for the development to be viable and it is demonstrated that the proposed development is in the long-term public interest.’ (Draft NPF4, p.69) How is ‘the public interest’ to be defined in this context and could there be an upper cap for emissions created by a single development? We feel additional detail is required in the final NPF4 so it is clear how the planning system will transform in response to the climate emergency.

Furthermore, in part c), as 'significant emissions' is not defined it is not clear which types of development will be covered by this policy. In addition, only housing developments of 50 or more dwellings or those on a site over 2ha are included in 'major' developments regardless of type of housing and likely greenhouse gas emissions (i.e., 49 large luxury homes may have much larger emissions footprint than other developments of 50+ smaller dwellings).

**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?**

It is welcome that the draft NPF4 acknowledges that we face a nature crisis. With 1 in 9 species at risk of extinction in Scotland, the planning system must shift to actively contribute to nature restoration efforts as a matter of urgency. We agree with the thrust of this policy however we urge that the language be strengthened. For example, there should be a requirement that development plans contribute meaningfully to biodiversity enhancement, rather than just 'facilitate' it.

LINK members strongly encourage greater recognition of the role of robust, long-term management plans in protecting and restoring our natural environment. Improving management and regulation of land use is essential for nature recovery and delivering positive effects for biodiversity. Policy 3 could be strengthened by promoting the use of management plans for National Scenic Areas and SSSIs. For example, only 3 of Scotland's 40 National Scenic Areas currently have active management plans in place.

If Nature Networks are to be integral to facilitating biodiversity enhancement/positive effects for biodiversity, they must deliver diverse well-connected habitat types, including grasslands and wetlands, which in turn must result in positive outcomes for species. We also need them to be mapped and safeguarded in Local Development Plans. Policy 3a could, for example, instruct Local Development Plans to map, identify and safeguard Nature Networks. Furthermore, to aid interpretation of what Nature Networks may include, it would be helpful to expand the list as drafted in Policy 3a. The definition of Nature Networks in the glossary is helpful and suggests that Nature Networks are intended to connect wild places - this definition should be reflected in policy 3a by 6 referencing nationally important landscape types, including Wild Land Areas, which while not protected by statute remain valued landscapes and important places for wild plants and animals.

NPF3 contained commitments around a National Ecological Network as did the previous Scottish Biodiversity Strategy. Similarly, the Scottish Pollinator Strategy (published by Scot Gov in 2017) has specific objectives to "Support policy initiatives from Planning authorities and developers that include pollinators in the planning system, for example development proposals, management of public land, road verges, railway embankments and power way leaves." and "to Identify and capitalise on opportunities to encourage flower-rich, and other pollinator-friendly habitat management and connectivity under existing policies, including Scottish Rural Development Programme, Land Use Strategy, Scottish Forestry Strategy, Scottish Planning Policy and National Planning Framework 3." However, with NPF3 there was no clear delivery plan associated with this commitment and as such there has been no delivery. In the current draft, we see no clear delivery mechanism associated with nature networks and we suggest that NPF 4 should:

- Explicitly require each Planning Authority to produce an opportunity mapping based nature network, encouraging collaboration between neighbouring areas for example the CSGN area or borderlands RLUP pilot. The EcoCo LIFE Ecological Coherence Protocol tool used across the CSGN should be used. Also encourage adoption of existing mapped networks such as Buglife's B-Lines.

- Attach a specific time frame to this process including a requirement to report to Nature Scot (avoiding mistakes of the failed “biodiversity reporting duty”)
- Make resources available to Planning Authorities to facilitate this including central resource at Nature Scot to ensure effort is not duplicated needlessly and communities of place and interest are properly engaged
- Explain how nature networks fit together with Local Development Plans, the Infrastructure Investment Plan and Regional Land Use Partnerships / Frameworks. This is necessary to achieve strategic join up.

Policy 3b should be bolder and require more from developers given the guiding principles of NPF4 - all development proposals should contribute to biodiversity enhancement but the greater the scale of the development, the greater the expected contribution that development makes to biodiversity enhancement. The greater material footprint of a development, the greater the expected land use change and where land is being converted from a more natural state to built environment, so the requirement for biodiversity improvement should be high and if not discharged (e.g., through a land management and design approach for nature recovery) then the presumption should be to refuse that development.

As mentioned previously, for this policy to be effective local planning authorities require the resources needed to hire planners with experience in biodiversity and ecological science. Evidence from RTPI shows that planning departments within local authorities have seen a 25% reduction in staff since 2009. An assessment by the Association of Local Government Ecologists in 2016 found that there is huge variation across different UK planning authorities in the quality of ecological reports they use to assess development applications. Indeed, LINK members report that many ecology posts have been cut across local authorities creating enormous difficulties and discrepancies in in-house expertise and experience across Scotland. Most recently, capacity concerns in ecological and planning staff were highlighted in a recent survey of Scottish LPAs. Lack of enforcement staff to ensure compliance was also highlighted as a big concern with two-thirds of respondents rating it as a high or very high risk to their LPA's ability to implement NPF4 and Positive Effects for Biodiversity.

LINK members suggest every local authority should have, as a minimum, ecologists and environmental planners who are adequately resourced and trained. Without in-house ecological expertise in local authorities, positive effects for biodiversity cannot be assessed and delivered. To implement transformation in Scottish planning there is an urgent need for increased capacity and expertise at local levels.

The concept of developments delivering ‘positive effects for biodiversity’ is mentioned only very briefly at the end of this policy, though it is mentioned elsewhere in the text. We ask the government to set out how developments’ contributions to ‘positive effects for biodiversity’ will be assessed in a tangible, measurable and consistent way. At an LPA event, co-ordinated by CIEEM representatives from over 70% of Scottish LPA's gave a very clear message that clarity, consistency, certainty, and confidence were needed and language should be much tighter as this would help planning authorities when dealing with development proposals. A lot of time and resources can be spent on negotiating with developers on small mitigation items, and loosely worded policy would mean that this would still be the case. There was consensus that a metric and standardised approach was needed across all LPAs to set clear expectations for LPAs and developers and put the onus on developers to design and demonstrate positive effects into developments at the outset.



We also encourage the government to consider whether long term monitoring and evaluation should be a policy requirement of every national, major and EIA development.

**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?**

The NPF4 should reflect parliament's legislative agenda to incorporate international human rights instruments such as the International Covenant on Economic, Social and Culture Rights and the Aarhus Convention – and the human right to live in a healthy environment – into Scots law.

**30: Policy 8: Infrastructure First. Do you agree that this policy ensures that we make best use of existing infrastructure and take an infrastructure first approach to planning?**

The policies noted might help make best use of existing infrastructure, but do not ensure it. It would be better with an additional point saying that: use of existing infrastructure needs to be optimised and developments planned accordingly.

The definition of infrastructure as set out in the Infrastructure Investment Plan for Scotland 2021-22 to 2025-2026 now includes natural infrastructure. This component of infrastructure must be included within Policy 8 to fully grasp the opportunities for investing in nature and coordinating the delivery of nature based projects and/or integration of nature into infrastructure projects. An infrastructure first approach that includes nature would secure ecosystem service benefits that deliver on both climate and biodiversity terms.

**31. Policy 9: Quality homes. Do you agree that this policy meets the aims of supporting the delivery of high quality, sustainable homes that meet the needs of people throughout their lives?**

Our members welcome the introduction to the Quality Homes policy which states the need for our housing stock to contribute less to Scotland's climate emissions and highlights the wider benefits of better energy efficiency and greener buildings. However, the draft NPF4 has not sufficiently recognised that building housing *per se* contributes to carbon emissions and has significant impact on biodiversity through loss of wildlife corridors, loss of mature trees and woodland, consumption of materials, and concreting over soil, including peatland.

We would like to see Policy 9 recognise and encourage a significant contribution to housing targets to be made by existing empty homes, or buildings not currently used for residential purposes, being returned or converted to use as homes.

This approach would be far more in keeping with other policies on circular economy and 20 minute neighbourhoods, with the benefits of reducing carbon emissions through embodied energy and reducing construction waste. It will also protect other land uses such as agricultural land.

LINK members believe that the policies that try to deliver affordable housing by allocating generous amounts of land for all-tenure housing are flawed. NPF4 policies focus on local authorities allocating enough land for housing and using the Minimum All Tenure Housing Land Requirement (MATHLR) as the basis for establishing a deliverable pipeline of land for housing.

Our concerns are:

- That this continues to rely on the delivery of the majority of affordable and more diverse housing through the private sector, which does not deliver the proportion or variety of affordable housing desired.
- It is a very inefficient means of delivering housing in terms of land, because it relies on larger amounts of land to be allocated for housing, assuming that not all sites will be viable or deliverable. This makes it harder to deliver an 'infrastructure first' approach to housing, because it is not clear which land is going to be used, so upfront infrastructure cannot always be provided ahead of time.
- It is an inefficient means of delivering the level of affordable housing needed because it requires large amounts of housing land only a proportion of which will be used for affordable housing through section 75 agreements.
- It focuses on new-build to deliver housing rather than looking to reuse existing buildings.
- Over generous allocations will result in greenfield sites being used disproportionately as they are often more profitable to deliver than the more complex brownfield sites.

In order to achieve the wider goals of Housing to 2040 and NPF4, including community wealth building, meeting targets for diverse housing needs and meeting climate and biodiversity ambitions, planning policy needs to find the most effective means of delivering housing efficiently in terms of land use and resource use. Policy hierarchy needs to be clear about the primacy of universal policies and particularly the significant weight given to the climate emergency with respect to housing developments.

The market delivery of affordable housing is recognised as inefficient and policy should look forward to how changes in land assembly practice and more public-led planning will improve all the NPF4 outcomes required by the 2019 planning legislation.

The current Minimum All Tenure Housing Land Requirement policy or MATHLR in Annex B may fulfil the housing land target requirement included in the 2019 Planning Act but it appears to have been developed in a 'climate-free' space without consideration of the most sustainable, low emission means of delivering better and appropriate housing for all who need it. Given this, it must be ensured that the climate policies in NPF4 are applicable to proposed housing developments.

Our members are aware that the current 2014 wording of Scottish Planning Policy has been interpreted in such a way that some speculative housing developments, which would otherwise have been considered unsustainable have been approved on the basis of the so-called tilted balance. We welcome the fact that the policy proposed has moved away from this mechanism and hope that some of the terminology in the draft is further clarified to ensure the primacy of the development plan and that local authorities are able to direct new housing to the most sustainable locations making the most of existing infrastructure. The Scottish Government must resist the insertion of any new version of the so called 'tilted balance' into NPF4 or the Delivery Programme as this would undermine the climate and biodiversity policy intentions of the framework and its underpinning spatial principles.

The statement of community benefit proposed at 9e) should be expanded to address positive and negative environmental changes that will impact the local community. It is not clear how a community will be involved in the assessment of these statements or be able to highlight any oversights. If the relevant development is then approved will the statements be used as a basis for some of the conditions of approving development and how would they be enforced?

It is suggested that to aid understanding for lay people/communities that it is explained in the text that the figures calculated for the Housing Land Requirement (HLR) and the MATHLR (referred to in 'Quality Homes' Policy 9) include a generous uplift as a contingency for anticipated difficulties in developing some of the allocated housing sites.

**34. Policy 12: Blue and green infrastructure, play and sport. Do you agree that this policy will help to make our places greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport?**

LINK members support the direction of this policy to increase the number of green spaces, green roofs and sustainable urban drainage systems set out in the draft document. We agree that blue and green infrastructure can provide a range of associated benefits to peoples' health and wellbeing and provide important shared community spaces. They can also offer benefits to biodiversity and climate mitigation and adaptation.

Blue and green infrastructure needs to be planned and implemented using sound ecological knowledge to ensure that such infrastructure delivers true benefits for biodiversity and hence for the vital ecosystem services that biodiversity supports. Adoption of many Nature-based Solutions such as green roofs, walls and communal spaces are essential. Consideration of ecological networks must be included as a requirement of any new housing build to reduce impacts of fragmentation.

Blue and green infrastructure are not an added benefit but an integrated requirement for future planning and development and we would like this to be given far greater weighting and detail on how it will be implemented and enforced.

Blue and green infrastructure can play a part in establishing a Nature Network. For example, semi-natural habitats can contribute toward such a Network, with protected sites at the core, connecting outward to high biodiversity sites in between with semi-natural and other natural infrastructure on the fringes.

As with other policies set out in the draft, it is not clear how decisions to promote more green and blue spaces will be made in practice as the language is very high level. NPF4 should require Local Development Plans to support land uses that help to restore and recover nature at the identified and safeguarded green and blue infrastructure sites and areas.

Our members also suggest that the government clearly sets this policy within the wider context of statutory access rights under the Land Reform (Scotland) Act 2003. While it's important that as many people as possible have access to high quality green and blue spaces close to where they live and work, the planning system also has a role in protecting access rights and future-proofing land for potential access provision. For example, a new planning application for a development on a greenfield or brownfield site may have a negative impact on informal routes across this ground which have been established over time and are much valued by the local community. Similarly, there may be wilder areas of rough grassland or woodland on the site which are important for public enjoyment as well as for biodiversity. These routes are likely to be useful for local leisure or active travel purposes and should be protected through the use of planning conditions or developer agreements. At the same time, the planning system needs to be alert to opportunities to preserve land for potential future active travel or leisure corridors (or for biodiversity enhancement) on such sites.

**35: Do you agree that this policy will help to ensure places are resilient to future flood risk and make efficient and sustainable use of water resources?**

We welcome the promotion of natural flood risk management as it can provide social, economic, and environmental benefits. It should, however, be made clear this policy sits alongside policy 33 (Peat and carbon rich soils) as restoring and keeping such areas healthy, within the water catchment, can help alleviate downstream flooding issues as well as storing carbon. Similarly, creating and restoring habitats such as ponds, wetlands and woodlands can also help reduce run off, flood risk and contribute to a Scotland wide nature network. The policy would however benefit from a definition of natural flood risk management to clarify it is a strategic, catchment-based approach that protects and uses natural and systems and habitats (with any intervention in line with natural process) and promotes soft engineering techniques that can hold flood water.

Although the policy seems directed to supporting systems and measures that also benefit people and nature, this is not clearly articulated in the policy and is unlikely to result in effective results in practice. The policy should state that when designing natural flood management systems, early consideration should be given to how they can contribute to wider aims including Local Biodiversity Plan priorities and helping the delivery of positive effects for biodiversity, by highlighting the part that flood management should play in enhancing nature networks, creating new habitats, combating climate change and mitigating the effects of climate change. As well as providing valuable habitats themselves, for instance a well-designed pond, they can act as valuable 'stepping stones', connecting other habitats as part of green or natural infrastructure and as part of a Nature Network.

We note with concern the use of the qualifier 'wherever practicable' in bullet point 2 13f. Sustainable Drainage Systems (SuDs) have multiple benefits in terms of water management, improving biodiversity and amenity value. Although SuDs are a legal requirement for all new developments in Scotland, the design of SuDs is not always considered during initial site design and best practices are not always followed. Ecological advice should be sought to guide design and the creation of a long-term management strategy. The policy and legislation on SuDs needs to be tightened. Measures for the long-term management of SuDs need to be considered to ensure their effectiveness for both water management and biodiversity.

**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?**

Renewable energy developments, and their associated transmission networks, inevitably have an impact on our landscapes, and on our natural and cultural heritage. The planning system should recognise the potential for conflict and play a proactive role in siting and in mitigation to remove or reduce these. This includes assessing potentially damaging environmental impacts to protect our most sensitive landscapes and irreplaceable ecosystems from inappropriate development.

A national priority to significantly increase renewable energy generation in Scotland and contain measures that reduce the time taken to deploy a mix of renewables across Scotland should not come at an additional cost to biodiversity or result in extensive loss of nationally important natural carbon stores, most notably, Scotland's peatlands. An updated process would need to balance expediency with democratic engagement processes, environmental protection legislation and

opportunity for public scrutiny while considering all new developments against the need to reduce our overall energy demand.

LINK members support the protection of designated landscapes in Policy 19c and the recognition in Policy 19d that there are sensitive landscapes outside Scotland's National Parks and National Scenic Areas and that impacts on these remain a consideration in planning decisions. We also support the full list of considerations in Policy 19k and the inclusion of wild land impacts in this list. We would like to add a further bullet point to this list:

- The need for developments to align with circular economy principles by considering the lifecycle impact of materials used - considering the materials used and designed to enable the retention of value in materials and components.

We recommend 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. Under the definition, a biomass plant burning as much as 300,000 tonnes of wood a year would be 'medium-sized'.

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 globally.

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" or "low carbon energy".

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.

**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?**

We welcome the inclusion of Zero waste as a specific policy and, importantly, that the planning system should support development which reflects the waste hierarchy, prioritising the reduction and reuse of materials, and facilitate the delivery of new infrastructure to achieve this. We strongly urge stronger wording in this statement, changing 'should' to 'needs to' or similar. Other places where wording needs strengthening are under points a), b), c), d) changing 'should' to 'needs to'.

In general, we welcome the integration of the circular economy, the waste and investment hierarchies, making best use of existing buildings and infrastructure and a life-cycle approach to developments into NPF4. We would like to emphasise that although the circular economy might be seen as an 'economic and environmental opportunity'; it is a necessity for climate, nature and international justice. Our material footprint is more than double sustainable levels and we consume several times our share of planetary resources. Any measures to further strengthen and embed a shift to circularity would be welcome.

**42. Policy 21: Aquaculture. Do you agree that this policy will support investment in aquaculture and minimise its potential impacts on the environment?**

We welcome the reference to minimising 'impacts on the environment'. However, this then seems secondary to the focus of Policy 21's first section (a) which recommends local development plans 'guide new aquaculture development to locations that reflect industry needs'. This puts an emphasis on expanding the industry rather than protecting the natural environment. It also puts the responsibility on local authorities and their planners to interpret the policy, who may not have detailed understanding of a development's environmental impact or the cumulative impact from other existing and planned aquaculture developments.

The continued assumption against development on the north and east coasts to safeguard migratory fish species in section (b) is welcomed, however account should also be taken of key migratory routes on the west coast where that information is known, as highlighted by the recent Salmon Interactions Working Group report [1]. The outcome of the SEPA consultation on '*Proposals for a risk-based framework for managing interaction between sea lice from marine finfish farm developments and wild Atlantic salmon in Scotland*' [2] should also be referenced as a source to consult on appropriate areas for siting developments.

The remaining sections (c) and (d) emphasise support for development with no mention of environmental impacts, again leaving planners to interpret what is 'appropriate for the location'. This indicates a focus on growing the industry rather than its environmental sustainability.

There is no guidance on what should be considered acceptable environmental impacts, or what action should be taken if environmental impacts are not acceptable, i.e., penalties for failing to meet Environmental Quality Standards.

There is no guidance on regulation of pesticide use in the marine environment.

There is a lack of reference to other strands of policy and regulation that should be used to inform planning decisions, such as the development of the Scottish Government's Aquaculture Vision, or the independent review of the current regulatory framework for Scottish aquaculture by Professor Griggs [3].

There is also no reference to proposals for developments within Scotland's MPA network. Of particular concern should be developments within MPAs that have designated features that are at risk from salmon farming (e.g., fragile and sensitive benthic habitats such as maerl, seagrass, and flame

shell beds). The MPA network was established to ‘meet national objectives and help deliver an ecologically coherent MPA network in the Northeast Atlantic, contributing to the protection and enhancement of [Scotland’s marine area]’ (Marine (Scotland) Act 2010), yet salmon farms continue to operate within the MPA network and there are applications for more. *To conserve and improve the health of Scotland’s marine environment, it is imperative that new farm proposals are prohibited within MPAs containing features that are at risk from salmon farm activity.*

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[1] <https://www.gov.scot/publications/salmon-interactions-working-group-report-scottish-government-response/>

[2] <https://consultation.sepa.org.uk/regulatory-services/protection-of-wild-salmon/>

[3] <https://www.gov.scot/publications/review-aquaculture-regulatory-process-scotland/>

**47. Policy 29: Urban edges and the green belt. Do you agree that this policy will increase the density of our settlements, restore nature and promote local living by limiting urban expansion and using the land around our towns and cities wisely?**

LINK members support policy 29 and the clear setting out of the multiple benefits of Green Belts in the two paragraphs of preamble and in policy 29 a). We support the clear link in policy 29 a) between the use (and protection) of Green Belts and the prevention of unsustainable development with resulting benefits to the environment and quality of life.

We support the description of Green Belts in this section but given the extended list of exceptions to the presumption against development outlined on p.102 and the reference to ‘not undermining the purpose of the Green Belt at that location’ (policy 29c, first bullet point) we would urge that more detail is provided in order to understand how decisions to protect and make use of Green Belts will be taken in practice. In landscape terms the aim of retaining a predominantly open landscape nature in Green Belt should be promoted. All the potential exceptions in 29 b), not just the 4th bullet on recreation and sport, should be compatible with a countryside or natural setting.

Additionally, we suggest that the term ‘Green Belt’ is added to the glossary so that all stakeholders have a clear definition to refer to and would suggest the following: Green Belts are areas of open land around, beside or within a settlement where there is a presumption against most forms of development. The purposes of Green Belts are to protect the valued landscape settings of settlements and to prevent urban sprawl by directing development to more appropriate sites. Green Belts can also provide significant benefits for climate mitigation, nature recovery, public access and recreation, particularly given their proximity to centres of population. Green Belt boundaries are designated by Local Planning Authorities in Local Development Plans.

**48. Policy 30: Vacant and derelict land. Do you agree that this policy will help to proactively enable the reuse of vacant and derelict land and buildings?**

LINK members believe that the main focus of our planning system should not be on new development, but on revamping existing housing stock and other existing buildings, bringing empty homes back into use, using vacant and derelict sites and brownfield sites of low ecological value.

Policy 30 c) is supported as a key policy in shifting the development mindset towards how we transform our approach to development to better consider the climate and biodiversity crises, food production, health and wellbeing etc.

We support the proposal for local development plans to seek to reuse vacant and derelict land as a priority, on the condition that a full assessment is made of the contribution existing brownfield sites make to biodiversity. Plans must recognise the important role of our existing stock of buildings – which will continue to comprise the majority of our built environment – and which often underpin our sense of place and identity. Our existing buildings are an important store of carbon, and sensitive and creative reuse reduces our environmental footprint, and maintains our local environments, reducing the need for greenfield developments.

However, we urge that the biodiversity contribution of existing brownfield sites are assessed very carefully as part of the application process. Brownfield sites can have a high biodiversity value and provide an important refuge for plants and wildlife, on some occasions holding more rare and threatened species than ancient woodland (see examples in pp.4-5 of [this briefing](#)). While we agree with the proposal to locate developments on brownfield sites over greenfield sites, the final NPF4 must contain reference to assessing the biodiversity contribution of brownfield sites, including the contribution they could make to nature networks/ national nature network. We suggest the same qualification as used in Policy 31 for vacant and derelict land is adopted here: vacant and derelict land to be reused “where a return to a natural state is not likely” (p.105). Reusing existing, vacant buildings would make an important contribution to building a circular economy in Scotland, where construction currently accounts for [around half of Scotland’s waste](#).

We encourage site by site consideration of all vacant and derelict land, and in all situations where biodiversity value potentially exists, an open mosaic habitat [assessment](#) should be requested.

**49. Policy 31: Rural places. Do you agree that this policy will ensure that rural places can be vibrant and sustainable?**

This policy could be improved by making explicit the role rural places can play in addressing the climate and nature emergencies, which is stated earlier in the draft as being central to NPF4. In December 2021, the [UK Climate Change Committee](#) reported that Scotland’s annual targets for the next decade will be “very difficult to meet” and require changes to agricultural policy that are “sufficiently ambitious.” The proposed policy lacks a clear link with work currently underway on post-CAP low carbon agriculture which will impact Scotland’s rural places over the next decade and beyond.

We agree with the proposals on encouraging the prosperity and sustainability of rural communities and economies, reusing existing buildings and providing affordable housing. However, this policy makes no mention of the vital role rural places can make to the transition to a net zero, nature positive society and economy.

It is disappointing that the policy makes no mention of other work being taken forward in this area by other branches of government, namely the Land Use Strategy, development of Regional Land Use Partnerships and Frameworks, Good Food Nation legislation and Just Transition plans for the rural economy. The current discussions on agricultural transition and wider land-use policy must be taken



account of in the final NPF4, including consideration of the role that planning can play in supporting the transition of land use toward a nature-positive and net-zero future.

This policy again refers to vacant and derelict land. It mentions *“Development proposals in rural areas should be supported where the development will...reuse vacant and derelict land or brownfield where a return to a natural state is not likely”*. This language is worrying as the point of OMHPDL and wildlife-rich sites is that although yes, they can be ‘reclaimed’ by nature, it is their inability to return to a natural state that provides much of their value e.g., in the artificial substrates and mosaic of substrates, hydrology, slope, etc that they create. We encourage site by site consideration of all vacant and derelict land, and in all situations where biodiversity value potentially exists, an open mosaic habitat [assessment](#) should be requested.

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

LINK members greatly welcome the acknowledgement in this proposed policy that “the natural environment underpins our economy, health and wellbeing, biodiversity and climate resilience” (p.107). The focus on restoring and enhancing our natural places is also very encouraging as is the restated commitment to nature-based solutions and nature networks.

However, this rhetoric must feed into clear requirements and objectives for restoring nature that planning authorities and developers must meet.

It is good to see reference made to the precautionary principle in Policy 32h and we recommend that the final NPF4 makes explicit mention of the government’s guidance on environmental principles in the Continuity (Scotland) Act 2021 (currently under consultation).

LINK members strongly support the presumption against development in Scotland’s wild land stated in Policy 32i) and commend the Scottish Government for having the foresight to protect Scotland’s wild land for future generations. This policy fits with the infrastructure first approach required by policy 8 as wild land areas, by definition and their nature, do not have any infrastructure in them that could support large scale development.

However, as drafted, Policy 32i) would require a degree of interpretation of what ‘cannot be reasonably located outside of the wild land area’. To prevent a disjointed approach to interpreting what this means, we suggest adjusting the wording slightly to make it clear that development plans should protect wild land areas. Another way in which Policy 32 could aid certainty and consistency amongst planning decisions is to define or expand on what is understood by ‘nationally and internationally valued natural assets’. Clarity of meaning could be provided by expanding the text in Policy 32a) – we suggest with reference to wild land areas – or by including a definition in the glossary.

Regarding protected landscapes, including and beyond wild land areas, LINK members are disappointed that the opportunity has not been taken to strengthen these protections. While we welcome that there is no downgrading of existing protections, we would highlight that Policy 32 contains little that improves upon the protections in NPF3 and existing Scottish Planning Policy. The draft document rightly highlights the importance of delivering for climate and nature throughout, but this is another area where the delivery does not match this welcome rhetoric.

As highlighted at the CIEEM LPA event, Local Planning Authority staff are concerned about the strength of protection for Local Nature Conservation sites (LNCS). There appears to be a disconnect between Policy 3 and policy about sites (Policy 32 and point G). LPAs would like to see no further

degradation of these local sites as they are often a key mechanism for protecting biodiversity in local development management. Overall, policy wording around LNCSs needs to be strengthened to help LAs protect LNCSs as part of securing PeFB as well as considering them as an important component of ecological networks.

CIEEM (2022). Summary report from the Scottish Local Planning Authority event held January 2022 to discuss NPF4 and the Developing with Nature Guidance. <https://cieem.net/resource/a-summary-report-from-scottish-lpa-event-to-discuss-the-emerging-npf4-and-developing-with-nature-guidance/>

**51. Policy 33: Peat and carbon rich soils. Do you agree that this policy protects carbon rich soils and supports the preservation and restoration of peatlands?**

LINK members agree that peat and carbon rich soils have a critical role to play in addressing the climate emergency and reversing biodiversity loss. We agree that local development plans should protect these valued soils.

We urge that the language in part (c) of this policy is strengthened. Scotland's peatlands cover more than [25% of the land](#) and form a very rare habitat, capable of storing carbon while giving a home to many wildlife species. The UK Committee on Climate Change has been unequivocal about the [critical role of peatland restoration](#) in meeting Scotland's net zero target. They are one of our country's most important natural habitats. The policy as drafted leaves a concerning amount of leeway over what development would be acceptable on peatland and carbon rich soils.

It is also deeply disappointing that several exemptions have been given to the ban on commercial peat extraction. Specifically, the exemption on peat extraction that is to 'support an industry of national importance to Scotland' (p.109) is vague. We urge the Scottish Government to include more detail of how 'national importance' would be determined to avoid this acting as a future loophole to the restrictions.

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

The acknowledgement of the importance of trees and woodland to meeting climate targets and reversing biodiversity loss is very welcome. We strongly agree that local development plans should identify and protect existing woodlands and identify potential for woodland expansion through Forestry and Woodland Strategies - this would be important for delivering Nature Networks, where expansion is sensitive to other habitats that have a high biodiversity value (i.e., grasslands).

The new protections the policy will give to ancient woodlands and veteran trees is hugely welcome but highly dependent on correct implementation. However, policy 34b is a considerable improvement on the ambiguity of current Scottish Planning Policy and does have the potential to eliminate inappropriate development as a threat to ancient woodlands, and ancient and veteran trees. The policy could be strengthened further by changing the uses of the word "should" to "must". To allow planners and developers to comply with these policy changes the following will need to happen:

- The Scottish Government must see through the SNP manifesto and Programme for Government ancient woodland register commitment so that the current Ancient Woodland Inventory (AWI) is updated and made fit for purpose.

- Local authorities must be resourced with biodiversity and tree officers associated with their planning departments.
- As is the case for ancient woodlands, there needs to be an ancient and veteran tree inventory such as the Woodland Trust's Ancient Tree Inventory, to ensure planners and developers can comply with the requirements of policy 34.
- We also encourage a definition of ancient woodland to be added to the Glossary.

Whilst protections outlined for ancient woodlands and ancient and veteran trees are highly promising. There are many aspects of the NPF4's policies on Trees, Woodland, and Forestry that could be improved.

The policy allows the continuation of habitat fragmentation outlining "fragmenting or severing woodland habitats, unless mitigation measures are identified and implemented", as the damaging effects of habitat fragmentation are well understood a stronger stance should be taken.

Policy 34c) does not make any improvements on what is outlined in Scottish Planning Policy and the associated reference to the Scottish Government's Control of Woodland Removal Policy is absent from the draft NPF4. Whilst the reference is present in the draft LDP guidance it would be beneficial for it to be present in the NPF4 itself. Furthermore, the Control of Woodland Removal Policy is significantly outdated and should be updated to account for our improved understanding of climate change and biodiversity loss. This understanding should also be directly reflected in policy 34c) with aspects such as compensatory planting being compulsory not that "developers will generally be expected to provide compensatory planting".

The reference in Scottish Planning Policy to Tree Preservation Orders (TPOs) has been removed. Being one of the only protections for individual trees and groups of trees in Scotland this removal could prove highly damaging without anything in its place.

### **53. Policy 35: Coasts. Do you agree that this policy will help our coastal areas adapt to climate change and support the sustainable development of coastal communities?**

LINK members are disappointed that Policy 35 on coasts focuses solely on adaptation to climate change and economic regeneration without recognising the importance of coastal planning policy in protecting the marine environment and its contribution to delivering ocean recovery. All development proposals should be consistent with a revised and updated National Marine Plan, that prioritises the protection and restoration of marine species, habitats and ecosystem services throughout Scotland's seas.

The protection and recovery of the marine environment is vital to providing long-term sustainable development of coastal communities. The National Marine Plan should act as the primary guidance for all coastal development. In addition, development proposals should take account of a Blue Economy Strategy/vision that is based on principles of sustainability and recognises environmental limits, and on the aims of the Future Fisheries Management strategy to deliver sustainable fisheries.

Greater emphasis should be placed on protecting and restoring Scotland's blue carbon habitats as a nature-based solution. Our coasts have a significant potential for restoration of key habitats, such as seagrass, saltmarsh, native oysters, seaweeds and sediment communities, that can help meet net-zero targets and offer opportunities for community engagement, improved health and well-being and socio-economic regeneration.

For example, Scotland's sea lochs are globally significant "hotspots" for blue carbon,\* burying terrestrial carbon with important implications for national carbon accounting, and Scotland's Firths, estuaries and sea lochs provide excellent opportunities for increasing carbon sequestration through restoring important habitats such as seagrass beds and native oyster beds.

Communities around Scotland are already leading the way with several restoration projects. The planning policy should support delivery of the revised National Marine Plan and drive increased protection and restoration of blue carbon habitats around the Scottish coastline.

## **INTEGRATED IMPACT ASSESSMENTS**

### **Environment Report**

As there is no separate section for comments, the following points are made in relation to the Habitats Regulations Appraisal (HRA) for the NPF.

We consider that at this advanced stage of the NPF process, where defined national developments and detailed policy wording are included, the draft HRA should have been provided for comment at this stage. Indeed, in the Initial HRA Screening Record, diagram 1 shows that an 'Appropriate Assessment Information Report' should have been available at the time the draft plan was published. We consider that this information must be made available before any further consultation/further Parliamentary scrutiny is undertaken, to allow stakeholders an opportunity to provide comments on the plan-level consideration of impacts and associated mitigation. Furthermore, the NPF4 should not be approved by Parliament, and cannot be brought into effect/adopted, until the competent authority, in this case the Scottish Government, has undertaken full appropriate assessment.

**This response was compiled on behalf of the Planning Group and is supported by:**

RSPB Scotland

Planning Democracy

Scottish Wild Land Group

National Trust for Scotland

Woodland Trust Scotland

APRS

Froglife

CIEEM

Badenoch and Strathspey Conservation Group

Scottish Wildlife Trust

Amphibian and Reptile Conservation

Bumblebee Conservation Trust

The Cairngorms Campaign

John Muir Trust

Environmental Rights Centre for Scotland

Buglife Scotland

Ramblers Scotland

Scottish Campaign for National Parks

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